



# Notice to California residents

*Date last updated: October 2023*

Under the California Consumer Privacy Act (CCPA), as amended and expanded by the California Privacy Rights Act, California residents may have certain privacy rights depending upon the nature of their relationship with PlanConnect®. This Notice to California Residents (California Privacy Policy) describes those rights and how they may be exercised. It also provides information regarding the categories of personal information and sensitive personal information (collectively, personal information) PlanConnect® collects, and how it is used and disclosed.

The CCPA provides certain exemptions with respect to the personal information PlanConnect® collects that is regulated by certain other state and federal laws. With respect to such personal information, you may not have any or all of the rights listed below.

If you are a participant in an employee or workplace retirement plan that is serviced by PlanConnect®, please contact the plan sponsor with any requests to exercise your rights under CCPA.

## We do not sell or share your personal information

PlanConnect® does not sell or share your personal information, as such terms are defined under the CCPA. This includes the personal information of persons under the age of 16. However, as described below, we may share personal information with third parties as directed or consented to by you, or your employers or plan sponsors, as necessary for you to receive the benefit of such third party's services.

### What personal information we collect and disclose

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We collect personal information from the following sources:

- Information provided to us by you
- Plan sponsors
- Plan administrators
- Payment processors and financial institutions
- Service and investment providers
- Government agencies and self-regulatory organizations
- Financial professionals and third-party agents and brokers

We may disclose personal information we collect about you to the following categories of third parties:

- Third parties to whom you request we disclose your information
- Service and investment providers
- Government agencies, self-regulatory organizations and other third parties, as required by law
- Employers
- Plan administrators and plan sponsors

Within the past 12 months, PlanConnect® has collected and disclosed the categories of personal information below and sensitive personal information relating to California residents. Please note not every category of personal information or sensitive personal information is collected about each consumer or in connection with each transaction, product or service. In the past 12 months, PlanConnect® has not sold or shared personal information, as such terms are defined under the CCPA.

## Categories of personal information we collect:

<b>Identifiers</b>	Information including your name, postal address, email address, IP address, and Social Security number or other similar identifiers
<b>Customer records</b>	Includes records such as policy numbers and account information
<b>Classifications</b>	Includes characteristics of protected classifications of California and federal law, such as information about marital or gender identity
<b>Commercial information</b>	Includes records of products purchased
<b>Information about internet use</b>	Includes browsing history, search history and information regarding a consumer's interaction with our website or application
<b>Sensory information</b>	Includes audio, such as recordings of telephone calls with customer service
<b>Professional or employment-related information</b>	Includes information regarding your employment status and history

## Sensitive personal information

We collect certain categories of personal information that are considered **sensitive personal information** under California law. We collect the following sensitive personal information data identifiers primarily for the purposes of providing services to your current or former employer or plan sponsor's retirement plan, maintaining the security of our systems and as permitted by California law: (i) your Social Security, driver's license, state identification or passport number; (ii) your login information, financial account, debit card or credit card number, in combination with any required security access code, password or credentials allowing access to an account; (iii) your precise geolocation data; or (iv) your racial or ethnic origin.

## The purposes for which we use personal information

We collect personal information to provide services and compliance monitor your current or former employer or plan sponsor's retirement plan, and as otherwise required by law or regulations. The following are business purposes for which PlanConnect® uses the personal information that it collects:

- For our everyday business purposes — such as compliance reviewing your transactions to ensure they comply with the required laws, regulations and your current or former employer's or plan sponsor's retirement plan provisions, providing services you or your current or former employer or plan sponsor request, billing and processing of payments, maintaining records of your account(s), providing customer service or responding to court orders and legal investigations.
- For improving existing services.

- For security purposes — to protect your account(s) and prevent, detect and respond to illegal activity and security incidents.
- We do not sell or rent personal information to other companies.
- For debugging and analytics purposes — to improve our websites and IT infrastructure and analyze web traffic and consumer interactions and activity on our websites and customer portals.
- We only use the personal information we have about employees and retirement plan participants to provide retirement plan administration compliance services or to facilitate other general support.
- We require all personnel and vendors providing services for us to keep personal information confidential.

## How we retain personal information

PlanConnect® strives to limit the personal information it collects to those categories necessary to accomplish the specific business purpose for which it is being collected. As a result, how long we retain personal information depends upon the purpose for which it was collected. PlanConnect® retains personal information for as long as legally and operationally required based on applicable legal and regulatory requirements and the administrative and operational requirements of PlanConnect®'s businesses. As a general matter, if you are a plan participant of PlanConnect®, we may retain your personal information for the duration of your relationship with us, plus any additional periods required to (i) fully administer or service any product(s) and/or (ii) comply with applicable legal or regulatory requirements. If you are a current or former employee, we may retain your personal information for the duration of your affiliation with PlanConnect®, plus any additional periods required to (i) administer any benefits following the end of your affiliation with us and/or (ii) comply with applicable legal or regulatory requirements.

## California consumer rights

If you are a participant in an employee or workplace retirement plan that is serviced by PlanConnect®, please contact the plan sponsor with any requests to exercise your rights under CCPA.

Otherwise, you or your authorized agent may exercise your rights under the CCPA by calling toll-free **(800) 923-6669**. In order to process your request, we will need to verify your identity, which may require you to provide some personal information to us. If you are making a request on behalf of someone else, we will need to verify you have the authority to do so.

The CCPA provides California residents with right to receive certain disclosures regarding the collection, use and sharing of their personal information, and the right to know, delete, correct and limit sharing of personal information. To the extent that we collect personal information that does not fall under an enumerated exemption to the CCPA, your rights as a California resident are set forth below. In responding to a rights request, we will let you know if we comply with or deny the request. If we deny your request, in whole or in part, we will explain the basis for the denial.

### Right to know

You may request the following information about how we have collected and used your personal information during the past 12 months: (i) the specific pieces of personal information we have about you; (ii) the categories of personal information we have collected about you; (iii) the categories of sources from which that personal information was collected; (iv) the business purpose for collecting your personal information; (v) the categories of third parties to whom we disclose personal information.

You also have a right to request the specific pieces of personal information we have collected about you.

### Right to delete

You have the right to request that we delete any of your personal information that was collected by PlanConnect® directly from you. Please note PlanConnect® is generally unable to honor a request to delete the following:

- Personal information that is necessary to complete a transaction or provide a service that you or your current or former employer or plan sponsor requested.
- Personal information that was collected from a source other than directly from you.

- Personal information that is necessary to prevent, detect and respond to fraudulent or illegal activity and other security incidents.
- Personal information that is necessary to exercise free speech or another right provided for by law.
- Personal information used to debug to identify and repair errors that impair existing intended functionality.
- Personal information that is necessary to meet a legal obligation.

### **Right to correct**

You have the right to request that we correct any inaccurate personal information we maintain about you.

### **Right to limit the use and disclosure of sensitive personal information**

You have the right to request that we limit the use and disclosure of your sensitive personal information to that use which is necessary to provide you with products and services you have requested, and for certain other limited purposes as provided for under the CCPA.

### **Right to know about and opt out of sale or sharing of personal information**

PlanConnect® does not sell or share your personal information, as those terms are defined under the CCPA.

### **Right to non-discrimination**

PlanConnect® will not discriminate against you for exercising your privacy rights under the CCPA.

## **Exercising your California consumer rights and our contact information**

PlanConnect® will take steps to verify your identity before processing your request to know, correct or delete your personal information. We will not fulfill your request unless you have provided sufficient information for us to reasonably verify you are the individual about whom we collected personal information. If you have an account with us, we will use our existing account authentication practices to verify your request. If you do not have an account with us, we may request additional information about you. We will only use the personal information provided by you in the verification process to verify your identity or authority to make a request and to track and document request responses, unless you initially provided the information for another purpose. You may use an authorized agent to submit a request to know or a request to delete. When we verify your agent's request, we may verify both your and your agent's identity and request a signed document from you that authorizes your agent to make the request on your behalf. To protect your personal information, we reserve the right to deny a request from an agent that does not submit proof they have been authorized by you to act on their behalf.

### **Contacting us**

Please contact us with any questions or concerns regarding this policy by calling toll-free at **(800) 923-6669**, Monday–Friday, 9 a.m. to 5 p.m. ET.

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