

## Our Commitment to Your Privacy

Effective September 1, 2014

PensionSource Corporation ("PensionSource") recognizes and understands the importance of protecting the security and confidentiality of the personal information we collect from our customers. As such, we are committed to maintaining the security of your personal financial information. To demonstrate our dedication to keeping your data private, we have developed this Privacy Policy (hereto referred to as the "Policy") to disclose what types of information we may collect and how we might use that information.

As described below, some of your non-public personal information is disclosed to other carefully selected third parties. These other companies may or may not be affiliated with PensionSource. By accepting the [Terms of Service](#) or this Policy, you expressly consent to the release of your non-public personal information in a manner consistent with the following criteria.

Please note in particular that by accepting the [Terms of Service](#) or this Policy, you acknowledge and agree that the California Electronic Transactions Act ("CETA") applies to the transactions conducted on or through our web site and other internet offerings. As a result, you and PensionSource may conduct any transactions contemplated herein by electronic means. This means that you expressly agree to receive most all communications and disclosures from PensionSource, including those relating to privacy matters, via electronic mail, the web site or other electronic means.

Because of the rapidly evolving legal and business environment surrounding privacy on the Internet, please be aware that PensionSource reserves the right to modify this Policy at any time with reasonable prior notice. Please note that this Policy governs only non-public personal information collected from you by PensionSource web products. To the extent that you disclose information or data to other parties or websites while using our web products online, different rules or policies may apply. In these cases, we will notify you when you are no longer using a PensionSource web product.

In conclusion, unless specifically noted, any non-public personal information we still maintain for former clients will be protected in a manner with that of our existing customers. Such protections will continue until we are instructed to purge your data from our systems. These instructions will be further clarified at the time our services are terminated.

### Gathering of User Information

When you access our website, the type of Internet browser you use is automatically detected and noted in our Internet access logs. We use this information to monitor which pages are accessed and what pieces of information on those pages are most frequently referenced. In addition, throughout our sites, we may provide the visitor with the opportunity to subscribe to PensionSource events, to receive company news, to request company information or request product and service information. All of these items are generally available through the completion of an email contact form. The completion of any email contact form is strictly voluntary.

### Use of Cookies

Cookies are small files that save specific information about your visit to a website on your computer. There are two types of cookies, persistent and session-based. Persistent cookies remain on your hard disk after you've closed your browser or turned off your computer. The PensionSource website uses persistent cookies to assign a "User ID" only. These cookies identify you merely as a number and are used in producing site visitor statistics. Persistent cookies, left by our system, cannot be used to find out the identity of any user. In order to better protect our customers, great steps are taken to secure the private information passed by our systems using persistent cookies.

The cookies we use extensively are session cookies and remain in your computer's memory only until your browser session has ended and is completely closed. Session cookies disappear from your computer when you close your browser software or turn off your computer. Session cookies allow you to conduct transactions or request your own personal account information on our website. They may also contain identifying information provided by you to our website. The identifying information allows PensionSource to process your requested online transactions.

Without the session cookie information, we would not be able to complete your web transactions securely. Session cookies help us to verify your identity when you are logged in. If you are uncomfortable regarding the use of cookies, you may disable the use of cookies on your computer by changing the settings in your browser. However, limiting or disabling cookies on your computer may limit your ability to access some of PensionSource's website offerings.

### External Links

This website may provide links to other websites maintained by third parties not controlled by PensionSource. PensionSource is not responsible for the privacy policies, practices or content of such external links. These

organizations may maintain their own privacy statements and these statements should be reviewed thoroughly before any of the sites are accessed. PensionSource provides these links for your convenience only and you access them at your own risk.

### **Companies We Share With**

From time-to-time, we will make available tools provided by other firms that we feel complement the services we provide. In these cases, we will get your permission prior to sharing any of your personal information with these vendors.

### **Outside Service Providers**

We have arrangements with companies whose experience is essential for our own services to operate properly. For example, we work with firms that execute securities transactions, enable online account access, provide disaster recovery services and make account statements possible for our clients. These companies work at our direction, and we share only the client information necessary for them to perform their assigned tasks. They are required to safeguard any information we provide and use it only within the guidelines established by the service agreement we signed with their company.

### **How Your Information is Protected**

The online services and websites we sponsor have industry recognized security measures in place such as firewalls, encryption, intrusion detection and site monitoring. Unfortunately, no data transmission over the Internet is guaranteed to be 100% secure. As a result, we cannot guarantee the security of any information you transmit to or receive from us. This is especially true for information you transmit to us via email. We have no way of protecting that information until it reaches our computer systems. Once we receive your transmission, we will do our best to ensure its security on our servers.

Internally, we will restrict access to your personal information to only those employees who need the information in order to do their jobs. These employees are limited in number and are committed to the standards set forth in this Policy.

### **How Can You Help Protect Your Information**

The most effective privacy policy is to guard your personal information against disclosure and unauthorized use. Never provide personal information (including Social Security numbers or plan account information) over the phone unless you have initiated the call and know with whom you are speaking. We will never ask you for your password in an unsolicited phone call or email. Also, remember to sign out of the registered site and close your browser window when you have finished your work. This will ensure that others cannot access your personal information and correspondence after you have finished.

### **Reasons Why We May Notify You**

We may need to contact you regarding the current status of your account, possible down time due to maintenance or holidays, or to provide you with specific notices required by law.

### **A Special Note on Children**

We do not offer our services to anyone under the legal age of employment. If you utilize employees under this age, please contact us so that we may advise your firm on how their access will be handled.

### **Contact Information**

Questions regarding this statement should be directed to PensionSource by sending an email to [privacy@pensionsource.com](mailto:privacy@pensionsource.com) or write to:

Attn: Privacy Ombudsman  
PensionSource Corporation  
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Cerritos, CA 90703