



## **TSA Consulting Group, Inc. Privacy Policy**

### **Our Commitment to Privacy**

TSA Consulting Group, Inc. (TSACG) is committed to maintaining the confidentiality, integrity, and security of personal information about Plan Sponsors and the Participants in their Plans. We are proud of our privacy practices and want you to know how we protect this information and use it to service our customers.

We hope you will take a moment to review the full privacy policy of TSACG. Please note that certain details of this policy may depend on whether you deal with us through an investment professional, directly as an individual participant, or TSACG is providing services to your employer or plan sponsor.

### **How and why we obtain personal information**

TSACG takes great care to protect personal information about you and when we use it, we do so with respect for your privacy. We may use personal information about you to service your Plan Sponsor, process transactions in your account, respond to inquiries from you or your representative, or to fulfill legal and regulatory requirements. TSACG may collect public and non-public personal information about you from any of the following sources:

- You or your representative on applications or forms (for example, name, address, Social Security number, birth date, etc.)
- You or your employer or Plan Sponsor (for example, payroll, human resources, or benefits information)
- Transactional activity in your account (for example, distribution history and balances)
- Other interactions with TSACG (for example, discussions with our customer service staff or information you enter into our Web sites)
- Other sources with your consent or with the consent of your Plan Sponsor or representative.

### **How we protect information about you**

TSACG considers the protection of personal information to be a foundation of customer trust and a sound business practice. We employ physical, electronic, and procedural controls and we regularly adapt these controls to respond to changing requirements and advances in technology.

At TSACG, we restrict access to personal information to those who require it to develop, support, offer and deliver products and services to you and your Plan Sponsor.

### **How we share information about you with third parties**

TSACG does not share personal information about participants with unaffiliated third parties for use in marketing their products and services. We may share personal information with the following entities:

- Your Plan Sponsor
- Government agencies, other regulatory bodies and law enforcement official (for example, for tax purposes or for reporting suspicious transactions)

We may exchange information with other third parties as described below:

- TSACG provides workplace services to your employer or Plan Sponsor, such as benefits recordkeeping services or salary reduction agreement processing. TSACG may exchange any information received in connection with such services with your employer or Plan Sponsor or others they may authorize.
- If you conduct business through your investment professional, we may exchange information we collect with your investment professional or with others they may authorize.

### **How we share information about you within TSACG**

We may share personal information about you with various TSACG corporate affiliates including internal service providers who perform, for example, printing, mailing, and data processing services.

### **Privacy online**

Privacy, security and services in our online operations are just as critical as in the rest of our business. TSACG employs all of the safeguards described previously, along with the following Internet-specific practices.

We use firewall barriers, encryption techniques and authentication procedures, among others, to maintain the security of your online session and to protect participant information and systems from unauthorized access. We may also place cookies and similar files on your hard drive for purposes such as security, to facilitate site navigation, and to personalize your experience on our site. Our cookies do not identify you by name as an individual or by account number.

When you visit TSACG's Internet sites, we may collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our Web sites. This information may be used, for example, to alert you to software compatibility issues, or it may be analyzed to improve our Web design and functionality.

We may use third-party service providers to help us analyze certain online activities. For example, these service providers may help us measure the performance of our online transaction processing or analyze visitor activity on our Web sites. We may permit these service providers to use cookies and other technologies, such as Web beacons or pixel tags, to perform these services for TSACG. We do not share personally identifiable information about participants with these third-party service providers, and these service providers do not collect such information on our behalf.