

CMC Interactive, Inc. Privacy Policy

This privacy policy will explain how CMC Interactive (referred to as "CMC") uses the personal data we collect from you when you use our website or your employer contracts our services.

What data do we collect?

From our website visitors:

• Anonymized usage data generated from your interactions with our website.

For those who use our retirement services:

• Personally identifiable information (Name, email address, phone number, mailing address, social security number, etc.)

How do we collect your data?

You or your employer directly provide CMC with most of the data we collect. We collect data and process data when you or your employer:

- Register online or contract for any of our services.
- Use or view our website via your browser's cookies.

How will we use your data?

CMC collects your data so that we can:

- Manage your account.
- Provide and maintain our service, including monitoring the usage of our service.
- For the performance of a contract: the development, compliance and undertaking of the purchase contract for the services you or your employer have purchased.
- To contact you: To contact you by email, telephone calls, regarding updates or informative communications related to the functionalities of contracted services.
- To manage your customer support requests.

Children's Privacy

We do not aim any of our services directly at children under the age of 13, and we do not knowingly collect personal information about children under 13, and no part of our site is structured to attract anyone under the age of 13.

Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

How do we use cookies?

CMC uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website

What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

- Functionality CMC uses these cookies so that we recognize you on our website and remember your previously
 selected preferences. These could include what language you prefer and location you are in. A mix of first-party and
 third-party cookies are used.
- Marketing CMC uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device. Our marketing team members use this information to better understand how our services are utilized and how to come up with ways of improving your experience of those services.

How to manage cookies

You can set your browser not to accept cookies. However, in a few cases, some of our website features may behave unexpectedly as a result.

- Brave Browser. For more information, visit <u>Brave (Desktop)</u> (Best browser for privacy)
- Brave Mobile. For more information, visit (iOS), (Android) (Best browser for privacy)



- Google Chrome. For more information, visit Google Chrome
- Mozilla Firefox. For more information, visit Mozilla Firefox
- Safari Desktop. For more information, visit Safari (Desktop)
- Safari Mobile. For more information, visit Safari (Mobile)
- Android Browser. For more information, visit Android Browser
- Internet Explorer. For more information, visit <u>Internet Explorer</u>

Do Not Track Requests

While some internet browsers offer a "do not track" or "DNT" option that lets you tell websites that you do not want to have your online activities tracked, these features are not yet uniform and there is no common standard adopted by industry groups, technology companies, or regulators. Therefore, we do not currently commit to responding to browsers' DNT signals with respect to our websites.

Retention of Your Personal Data

CMC will retain your personal data only for as long as is necessary for the purposes set out in this privacy policy. We will retain and use your personal data to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies. (Personal data is typically held for the duration services are utilized, and then for an additional 7 years to meet SEC and/or DOL requirements.)

CMC will also retain usage data for internal analysis purposes. Usage data is generally anonymized and aggregated information, retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our service, or if we are legally obligated to retain this data for longer time periods.

Transfer of Your Personal Data

While our services are restricted to U.S residents you should be aware that your information, including personal data, is processed at CMC 's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of your state, province or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

Your consent to this privacy policy followed by your submission of such information represents your agreement to that transfer. CMC will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and no transfer of your personal data will take place to an organization unless there are adequate controls in place including the security of your data and other personal information.

How Your Information May Be Shared

We do not sell or rent your privacy information to anyone.

Employees and Vendors

Required for the services you or your employer contract us for (Third Party Administration (TPA), record keeper (RK).

Business Transactions

If CMC is involved in a merger, acquisition or asset sale, your personal data may be transferred. We will provide notice before your personal data is transferred and becomes subject to a different privacy policy.

Law enforcement

Under certain circumstances, CMC may be required to disclose your personal data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

CMC may disclose your personal data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of CMC
- Prevent or investigate possible wrongdoing in connection with the contracted services
- Protect the personal safety of users of the service
- Protect against legal liability

Security of Your Personal Data

When we collect and process personal information, and while we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorized access, disclosure, copying, use, or modification. Although we will do our best to protect the personal information you or your employer provide to us, we advise that no method of electronic transmission or storage is 100% secure, and no one can guarantee absolute data security. We will comply with laws applicable to us in respect of any data breach and ensuing notification requirements.



You are responsible for selecting any password and its overall security strength, ensuring the security of your own information within the bounds of our services.

Here is a <u>guide for creating strong passwords</u> also, <u>LastPass</u> and <u>1Password</u> (there are others) are both good password management systems that help greatly in managing your many long and complex passwords.

Limits of Our Policy

Our website may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites and cannot accept responsibility or liability for their respective privacy practices.

Changes to Our Privacy Policy

At our discretion, we may change our privacy policy to reflect updates to our business processes, current acceptable practices, or legislative or regulatory changes. If we decide to change this privacy policy, we will post the changes here at the same link by which you are accessing this privacy policy and provide you notification via reasonable electronic means. This privacy policy was last updated on 2021 June 1.

Your Privacy Rights.

You have the following rights. To exercise these rights, please contact us as set forth below.

- Access personal information about you, including confirming whether we are processing your personal information and obtaining access to your personal information
- Request correction of your personal information where it is inaccurate or incomplete
- Request deletion of your personal information
- Request restriction of or object to our processing of your personal information
- Withdraw your consent to our processing of your personal information.

If you have any questions about our company's privacy policy, the data we hold on you, or you would like to exercise one of your data privacy rights, please do not hesitate to contact us.

Email us at: info@cmcinteractive.com Call us at: (212) 402-1850 or (888) 828-1341 Or write to us at: CMC Interactive, LLC, 75 Broad Street, Suite #2200, New York, NY 10004