

# FACTS

## WHAT DOES PCS RETIREMENT, LLC DO WITH YOUR PERSONAL INFORMATION?

### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Employment information and account balances
- Investment experience and risk tolerance

When you are *no longer* our customer, we continue to share your information as described in this notice.

### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons PCS Retirement, LLC ("PCS") chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does PCS share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> Such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> We do not share information with our affiliates or other non-affiliated third parties to offer you products and services without your consent.	No	We do not share
<b>For joint marketing with other financial companies</b>	No	We do not share
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We do not share
<b>For nonaffiliates to market to you</b>	No	We do not share

### Questions?

Call us at 888-621-5491 (PCS), 866-634-5873 (Aspire), or 801-486-3087 (ABGRM)

What we do	
<b>How does PCS protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does PCS collect my personal information?</b>	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>■ open an account or make deposits or withdrawals from your account</li> <li>■ seek advice about your investments or tell us about your investment or retirement portfolio</li> <li>■ enter into an investment advisory contract</li> </ul>
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. [See below for more on your rights under state law.]</p>
Definitions	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <p><i>Our affiliates include our parent company, Fiduciary Services Group, LLC ("FSG"), and FSG's affiliated companies: The Advisor Lab, LLC; AdvisorTrust, Inc.; Aspire Financial Services, LLC; Aspire Corporate Holdings, Inc.; InvestLink, LLC; InvestLink Technologies, LLC; ABG Consultants, LLC; Rocky Mountain Employee Benefits, Inc.; Fiduciary Advisors, LLC; and Efficient Advisors, LLC.</i></p>
<b>Nonaffiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <p><i>Although PCS does not share with nonaffiliates to market to you, PCS shares information to help a retirement plan's other service providers provide their services.</i></p>
<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <p><i>PCS does not jointly market information.</i></p>
Other important information	
<p>PCS shares information to help a retirement plan's other service providers, including nonaffiliates, provide their services.</p> <p>If you are a <b>California</b> resident, please refer to the enclosed supplement.</p> <p><b>For Nevada residents</b> – We are providing this notice to you pursuant to state law. You may request to be placed on our internal "do not call" list at any time by calling 1-888-320-6250. You may obtain further information by contacting the Nevada Attorney General, 555 E. Washington Ave., Suite 3900, Las Vegas, NV 89101; phone 1-702-486-3132; email <a href="mailto:BCPINFO@ag.state.nv.us">BCPINFO@ag.state.nv.us</a>.</p>	

## Privacy Notice Supplement for California residents

Each of PCS Retirement, LLC; Aspire Financial Services, LLC; InvestLink, LLC; InvestLink Technologies, LLC; *ABG Consultants, LLC*; *Rocky Mountain Employee Benefits, Inc.*; and AdvisorTrust, Inc. (each referred to with “we”, “us”, “our”) furnishes this notice.

This Privacy Notice Supplement for California residents supplements the information in our national Privacy Notice. This applies only to a human who resides in the State of California (“consumer” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”). Terms defined in the CCPA have the same meaning when used in this notice.

### Information we collect

We collect information that could identify, relate to, describe, refer to, be associated with, or be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we collected some of these categories of personal information from some consumers in the last 12 months:

	<i>Category</i>	<i>Examples</i>	<i>Collected?</i>
A	Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers	Yes
B	Personal information categories listed in California’s Customer Records law [Cal. Civ. Code § 1798.80(e)]	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information	Yes
C	Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information)	Yes
D	Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Yes
E	Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data	No
F	Internet or other similar network activity	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement (other than on our websites or through our communications)	No
G	Geolocation data	Physical location or movements (including IP address)	Yes
H	Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	No
I	Professional or employment-related information	Current or past job history or performance evaluations (other than dates of employment with employers on our system)	No
J	Nonpublic education information (under the Family Educational Rights and Privacy Act [20 U.S.C. § 1232g; 34 C.F.R. part 99])	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records	No
K	Inferences drawn from other personal information	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Yes

Personal information does not include:

- publicly available information from government records;
- deidentified or aggregated consumer information;

- information excluded from the CCPA's scope, such as:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including
    - the Fair Credit Reporting Act (FCRA);
    - the Gramm-Leach-Bliley Financial Modernization Act (GLBA);
    - the California Financial Information Privacy Act (FIPA); and
    - the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from these categories of sources:

- our (and our affiliates') service providers;
- your retirement plan's or other account's custodians;
- your retirement plan's administrators (which usually includes your employer), trustees, investment managers, investment advisers, and other fiduciaries;
- directly from you (for example, from forms you complete, or investments or services you use);
- indirectly from you (for example, by observing your actions in our websites and other computer apps);
- from information publishers and services we use, including LexisNexis and Trulioo.

## Use of personal information

We may use or disclose the personal information we collect for one or more of these business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask about our services, we will use that personal information to respond to your inquiry. If you provide your personal information to use a service, we will use that information to perform or facilitate the service. We may also save your information to facilitate new services.
- To provide, support, personalize, and develop our website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- To respond to law enforcement requests, and as required by law, a court's order, or legal process.
- As described to you when collecting your personal information, or as otherwise provided in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## Sharing personal information

We may disclose your personal information to a service provider or third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with these categories of third parties:

- our (and our affiliates') service providers;
- your retirement plan's or other account's custodians;
- your retirement plan's administrators (which usually includes your employer), trustees, investment managers, investment advisers, and other fiduciaries;
- an insurance or investment issuer (if needed to meet a duty or obligation about banking, insurance, or securities law);
- third parties as disclosed to you.

## ***Disclosures of personal information for a business purpose***

In the preceding 12 months, we disclosed these categories of personal information for a business purpose:

- A) Identifiers.
- B) California Customer Records personal information categories.
- C) Protected classification characteristics under California or federal law.
- D) Commercial information.
- E) We did not disclose biometric information.
- F) We did not disclose internet or other similar network activity.
- G) We did not disclose geolocation data.
- H) We did not disclose sensory data.
- I) Professional or employment-related information.
- J) We did not disclose nonpublic education information.
- K) Inferences drawn from other personal information.

We disclose your personal information for a business purpose to these categories of third parties:

- our service providers;
- your retirement plan's or account's service providers, even if not our service provider; and
- your retirement plan's or account's fiduciaries.

## ***Sales of personal information***

In the preceding 12 months, we had not sold personal information.

## **Your rights and choices**

The CCPA provides California residents with specific rights regarding their personal information. This part describes your CCPA rights, and explains how to exercise those rights.

### ***Access to specific information and data-portability rights***

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see "Exercising access, data-portability, and deletion rights"), we will disclose to you:

- the categories of personal information we collected about you.
- the categories of sources for the personal information we collected about you.
- our business or commercial purpose for collecting or selling that personal information.
- the categories of third parties with whom we share that personal information.
- the specific pieces of personal information we collected about you (a data-portability request).
- if we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### ***Right to delete information***

With some exceptions, you have the right to request that we delete any of your personal information we collected from you and retained. Once we receive and confirm your verifiable consumer request (see "Exercising access, data-portability, and deletion rights"), we will, unless an exception applies, delete (and direct our service providers to delete) your personal information from our (and their) records.

We may deny your request if we need the information for us or our service provider to:

- complete the transaction for which we collected the personal information.
- perform our contract with you.
- provide a good or service you requested.
- take actions anticipated within the context of our ongoing business relationship with you.
- meet a duty or obligation to your retirement plan, or to its administrator, trustee, custodian, investment manager, investment adviser, or fiduciary.
- meet a duty or obligation under a law that regulates banking, insurance, or securities.
- detect security incidents.

- protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- debug products to identify and repair errors that impair existing intended functionality.
- exercise free speech.
- ensure the right of another person to exercise their free-speech rights.
- ensure the right of another to exercise another right provided for by law.
- comply with the California Electronic Communications Privacy Act [Cal. Penal Code § 1546 1546.4].
- engage in public or peer-reviewed scientific, historical, or statistical research—if you previously provided informed consent—in the public interest that adheres to all other applicable ethics and privacy laws, when the information’s deletion may likely render impossible or seriously impair the research’s achievement.
- enable solely internal uses aligned with consumer expectations based on your relationship with us.
- comply with a legal obligation.
- make other internal and lawful uses of that information compatible with the context in which you provided it.

### ***Exercising access, data-portability, and deletion rights***

To exercise the access, data-portability, and deletion rights described above, please submit a verifiable consumer request to us by:

- calling PCS at 888-621-5491 or Aspire at 866-634-5873; or
- emailing us at [compliance@401kaccountservices.com](mailto:compliance@401kaccountservices.com)

Only you (or a person registered with the California Secretary of State that you authorize to act on your behalf) may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may request access or data portability only twice within a 12-month period.

A verifiable consumer request must:

- provide sufficient information that allows us to verify you are the person about whom we collected personal information (or the person’s authorized representative); and
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to your request.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to have an account with us.

We will use personal information provided in a verifiable consumer request only to verify the requestor’s identity or authority to make the request.

### ***Response timing and format***

We try to respond to a verifiable consumer request within 45 days of our receipt. If we require more time (up to 90 days), we will inform you in writing of the reason and extension period.

If you have an account with us, we will deliver our written response to that account. If you have no account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will cover only the 12-month period preceding the verifiable consumer request’s receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data-portability requests, we will select a format that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We charge no fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we require a fee, we will tell you why we made that decision and give you a cost estimate before we complete your request.

### ***Your rights about sales of personal information***

Because we do not sell personal information, this notice does not explain opt-out or opt-in rights.

## **Non-discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- deny you goods or services.
- charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- provide you a different level or quality of goods or services.
- suggest that you may receive a different price or rate for goods or services, or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that could result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms. Participation in a financial incentive requires your prior opt-in consent, which you may revoke at any time.

## ***Other California privacy rights***

Nothing in this notice about the California Consumer Privacy Act of 2018 weakens your rights under other California laws.

## **Changes to our Privacy Notice**

We reserve the right to change our Privacy Notice, including our national notice and our California supplement. When we change our Privacy Notice, we will post the updated notice on our website. Also, we'll send you a notice to the extent law requires.

## **How to contact us**

If you have any question about this notice, the ways in which we collect or use personal information, your choices and rights about a use, or how to exercise your rights under California law, please contact us at:

Phone: 888-621-5491 (PCS) or 866-634-5873 (Aspire)

Website: <https://pcs401k.com>

Email: [compliance@401kaccountservices.com](mailto:compliance@401kaccountservices.com)

Mail: PCS Retirement

Attn: Privacy Office

1801 Market Street, Suite 1000

Philadelphia, PA 19103