

## **Alight Financial Advisors, LLC Privacy Statement**

### **We Respect Privacy**

We at Alight Financial Advisors (AFA) appreciate that you have provided us with your personal financial information. We strive to maintain the privacy of such information. This Privacy Statement describes what non-public personal information we collect about you, why we collect it, and instances we may share it with others.

### **Personal Information Collected by AFA**

Throughout this Privacy Statement, we refer to the non-public information that personally identifies you as "personal information." To serve its customers better, AFA must collect and maintain accurate non-public information that personally identifies its customers ("Personal Information"). We obtain this information from applications and other forms submitted to us, from your relationship with us, from consumer reporting agencies, from our Web sites and from third-parties and other sources.

We may collect the following kinds of Personal Information through applications and other forms submitted to us, including:

- Identifier and contact information, including for example, your and/or your beneficiaries' name, date of birth, address, email address, telephone/fax numbers; Social Security number, mother's maiden name;
- Financial information including for example, net worth and tax information;
- Banking information including for example, the name of your banking institution, its contact information and routing number, the type of accounts held and the identification number of those accounts.

We collect Personal Information about transactions conducted through your defined contribution plan account, such as account balances, account activity, and investment history. We may collect information about the use of products and services offered by our affiliates, including Alight Solutions, its subsidiaries and affiliates (collectively, "Alight Affiliates"). We may obtain Personal Information about customer creditworthiness and credit history from consumer reporting agencies. We may collect Personal Information from outer sources in connection with providing or servicing your account.

Through our Web sites, we may collect Personal Information that is provided directly through online communications (such as an email address). We may also collect Personal Information about customers' Internet service provider, domain names, computer operating systems and Web browsers, customers' use of our Web sites and customer product and service preferences, through the use of cookies. AFA may use cookies for some administrative purposes, for example, to store customer preferences for certain kinds of information. None will contain information that will enable anyone to contact our customers via telephone, email or other means. If you are uncomfortable with the use of cookie technology, browsers can be set to refuse cookies. However, certain AFA services may depend upon the use of cookie technology. The disabling of cookies could impede the operation of such services.

### **Plan Information Disclosed by AFA**

To provide you with the services you requested, to serve you better, and to manage our business, we may disclose Personal Information as required or permitted by law, as described below.

**Information Disclosed to Third Party Financial Service Providers:** We may disclose Personal Information to institutions also providing services to your defined contribution plan account ("Third-Party Service Providers"), such as our subcontractors and record keepers and related service providers to your retirement plan accounts. PLEASE NOTE: When you sign up for services offered through AFA, the Third-Party Financial Service Providers may acquire Personal information about you, including from AFA, you or third-parties. The Third-Party Financial Service Providers' use of such Personal Information, including the Personal Information disclosed by AFA is governed by separate privacy policy(ies). AFA urges you to review these privacy policies carefully and to exercise any choices you may have about how Third-party Financial Service Providers use and disclose your Personal Information.

**Information Disclosed to AFA Affiliates:** In order to manage your accounts effectively, including servicing and processing transactions, to inform about products and services offered by us, our affiliates, and others, and as otherwise required or permitted by law, we may disclose Personal Information to Alight Affiliates. Such disclosures also may also be required under separate agreements you have with other Alight Affiliates and may be addressed under separate privacy policy(ies).

**Other Third-Parties:** Except as described above, we do not disclose Personal Information to nonaffiliated third-parties except to enable them to provide the products or services you have requested, to provide various other services on our behalf, or as is otherwise required or permitted by law. Some instances where we may disclose Personal Information to third parties include:

- servicing and processing transactions;
- protecting against fraud;
- maintaining institutional risk control; and
- responding to court orders or performing services on our behalf.

When we share Personal Information with other third-parties, they are required to limit their use of that information to the particular purpose for which it was shared and they are not allowed to share it with others except to fulfill that limited purpose. We respect privacy and do not share Personal Information with non-affiliated third parties for marketing purposes.

### **Protecting Personal Information**

We maintain physical, electronic and procedural security measures to help safeguard the Personal Information we collect. We have internal policies governing the proper handling of Personal Information. We require third parties that provide support services on our behalf to adhere to confidentiality standards with respect to such Information.

### **Contact Information**

If you have any questions or complaints of AFA's use of Personal Information or about this Privacy Statement, please send an email to: [privacy.info@alight.com](mailto:privacy.info@alight.com).

### **Amendments**

AFA reserves the right to amend this Privacy Statement at any time. We will inform you of any changes to this Statement as required by law.

**Important Information for Vermont Residents**

If you are a resident of Vermont, and for as long as you remain a resident Vermont, the information we may share about you with other financial institutions we have a joint marketing agreement is limited to your name, contact information, and information about our transactions and experiences with you. Additionally, within the Alight family, we will not share certain information (other than information about our transactions and experiences with you) from account applications or information we receive from third-parties without your authorization. To authorize the sharing of this information within the Alight family, please contact us directly.

**Important Information for California Residents**

If you are a resident of California, and for as long as you remain a resident of California, the information we may share about you with our affiliates and non-affiliated third-parties will be done only in a manner that is permitted under the California Financial Information Privacy Act (CFIPA) and federal law. In general, CFIPA requires us (1) to provide you with notice and the right to tell us not to disclose your Personal Information before we disclose such information to our affiliates or other financial institutions with which we have joint marketing agreements, and (2) to seek your express consent before we disclose your Personal Information to non-affiliated third-parties for marketing purposes. Additionally, within the Alight family, we will not share certain information (other than information about our transactions and experiences with you) from account applications or information we receive from third-parties without your authorization. To authorize the sharing of this information within the Alight family, please contact us directly.