



PRIVACY STATEMENT

Last Updated December 23, 2020

Welcome to our websites (collectively, "Site"), which are operated by Pentegra Services, Inc. on behalf of itself and its affiliates ("Pentegra," "we," "our," and "us."). We are committed to protecting your privacy. This privacy statement ("Statement"), which includes our [Terms of Use](#), describes the information we collect through our Site, how we use and share it, and how you can make choices about our use.

Click [here](#) to view our Privacy Notice for California Residents.

Please read this Statement carefully. Your use of our Site indicates you agree to this Statement. If you do not agree to this Statement, you are not authorized to use our Site.

Nothing in this Statement is intended to modify any other written agreement, if any, that may currently be in effect between you and Pentegra with regard to matters other than your use of the Site ("Additional Agreements"). If there is a conflict between this Statement and Additional Agreements, those Additional Agreements will control.

Because this Statement covers more than one Pentegra site, some terms may not be applicable to all sites and may depend on the nature of your relationship with us (e.g., as an individual investor, plan sponsor, etc.).

We may modify this Statement from time to time by posting a modified Statement on our Site or by giving you other notice. The modified Statement will be effective immediately upon posting or as provided otherwise in a notice. Please check this Statement regularly.

Information We Collect

Information You Provide to Us

You may browse the public areas of our Site without submitting any personally-identifiable information ("Personal Information") to us. You may need to have a Pentegra account to access certain areas of our Site.

We collect Personal Information when you voluntarily provide it to us, which may include your name, email and mailing addresses, telephone number, age, financial information, health information (in limited circumstances for insurance), social security number, and employment and marital information.

We may also 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, date of birth, compensation);

- Your employer or plan sponsor submitting records related to Pentegra’s administration of retirement plans in which you participate (for example, information included on enrollment forms, payroll files, contribution files);
- Transactional activity in your account (for example, trading history, loan and account balances);
- Other interactions with Pentegra (for example, discussions or email exchanges with our customer service staff, information you enter into our websites); and
- Other sources with your consent or with the consent of your representative (for example, from other financial institutions if you transfer account balances to Pentegra).

Information Automatically Collected

We may also automatically collect information about you when you visit our Site. This may include your IP address, browser type, time and date of your visits, referring URL, landing page, web pages viewed, and results of your searches on our Site. We may use this information to analyze how visitors use our Site so we can improve the quality of the information and services we provide.

We do not use information automatically collected by our Site to identify visitors individually but reserve the right to do so in circumstances where we may deem it necessary in connection with legal process or to protect our rights or the rights of a third party.

Google Analytics, a web analysis service supplied by Google Inc., may be enabled on our Site. Google Analytics provides aggregate information to allow us to analyze how our Site is used. You can learn more about Google’s privacy practices at: <https://policies.google.com/technologies/partner-sites> and <https://policies.google.com/privacy?hl=en>.

How We Use Your Information

We may use your Personal Information: to respond to inquiries and requests; communicate about your account(s); process your transactions; provide requested services; send newsletters and other information; fulfill our legal obligations; develop and provide our products and services; and promote our services. You may opt out of receiving promotional communications (but not emails concerning your accounts, transactions, and similar communications) through an “unsubscribe” link in our emails or by sending an email to: unsubscribe@pentegra.com.

How We Share Your Information

We do not rent or sell your Personal Information to any third parties and do not share your Personal Information with unaffiliated third parties for use in marketing their own products and services.

We may share your Personal Information with our affiliates and with third-party service providers that help us operate and provide services in connection with our Site (who are obligated to use it only to provide services specified by Pentegra) and with other parties as follows:

- Affiliated service providers (for example, Pentegra Trust Company in the event we are providing trustee or custodial services);

- Unaffiliated service providers (for example, printing and mailing companies, custodians, auditors, marketing service providers, and other entities who may provide services at Pentegra's direction);
- Government agencies, other regulatory bodies and law enforcement officials (for example, for tax purposes or for reporting suspicious transactions);
- Other third parties, with your consent or as directed by your representative (for example, if you use an external aggregation website or service that you have provided permission to access your Pentegra financial account on your behalf);
- Other organizations as permitted or required by law (for example, for fraud prevention or to respond to a subpoena); and
- Other parties such as investment companies, banks, insurance companies, or other financial institutions in order to establish investment accounts, process transactions, transfer assets, and make appropriate payments necessary to administer retirement plan accounts.

We reserve the right to disclose and use Personal Information and other information in special circumstances, including to enforce this Privacy Statement or any other part of our Terms, to comply with legal process or law enforcement, to address actual or suspected illegal activity, to protect our property or rights, to protect the rights and safety of others, and for other reasons we determine in good faith are necessary, appropriate or required by law. If we ever merge with, are acquired by, or otherwise consolidate with another organization, Personal Information may be transferred along with our other assets.

Pentegra may issue admin accounts that provide necessary access to plan sponsor records and participants of the plan. The plan sponsor must notify Pentegra if any staffing changes so that admin access is no longer appropriate so that access may be modified. Pentegra will not be responsible or liable if the plan sponsors delays in, or fails to, notify Pentegra in a timely manner that admin access should be modified or otherwise to administer access or an account appropriately.

Third-Party Web Sites; Social Media Features

Our Site may include links to web sites controlled and maintained by third parties ("Third-Party Sites") that we think may be of interest. We are not responsible for Third-Party Sites and do not endorse any Third-Party Site's content, activities, policies or practices. Any information you share with or actions you take on Third-Party Sites are governed by the applicable Third-Party Sites' terms of use and privacy statements, which you should review carefully.

Our Site also includes links to social media platforms governed by their respective privacy policies and terms of use. If you interact with a social media platform through our Site, we may collect the Personal Information you make available to us related to your social media account.

Record Retention

We will keep your Personal Information for as long as we need it for the purposes set out in this Privacy Statement or as otherwise required under The Employee Retirement Income Security Act of 1974 ("ERISA") or other applicable laws.

Security

We use efforts to safeguard your Personal Information, including encrypting your Personal Information during transmission, passwords, firewalls, intrusion detection, vulnerability scans, and audits. No transmission over the Internet can be guaranteed to be 100% secure. If you become aware of any suspicious activity relating to your account or information, it is your responsibility to contact us immediately.

Location of Servers

Information collected through our Site will be accessed and processed in the United States. By using our Site and providing your Personal Information to us, you consent to the collection, storage, processing and use of your Personal Information within the United States.

Your Choices Regarding Our Use of Your Personal Information

If you wish to review or update the information we have about you, please access your account or send an email to: customerservice@pentegra.com. You may opt out of receiving our promotional communications (but not emails concerning your accounts, transactions, and similar emails) through an "unsubscribe" link in our emails or by sending an email to: unsubscribe@pentegra.com.

Do Not Track (DNT) Requests

Some browsers may provide an option to inform web sites you visit that you do not want your activities to be tracked by cookies or other persistent identifiers called Do Not Track (DNT) preferences. There is not yet an industry-standard DNT protocol on how to interpret DNT signals. Accordingly, our Site does not respond to DNT signals from browsers at this time.

Children Under Age 13

Protecting the privacy of young children is especially important. We do not knowingly collect information directly from children under age 13 though we may collect information about children under age 13 for beneficiary purposes. If you are a parent or guardian and discover that your child under age 13 may have provided Personal Information through our Site, please contact us at privacy@pentegra.com.

Contact Us

For questions you may have about this Privacy Statement, please contact us by email at: privacy@pentegra.com or by mail at: Pentegra Services, Inc., 701 Westchester Avenue, Suite 320E, White Plains, NY 10604, Attn: Legal Department.

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

The California Consumer Privacy Act of 2018 ("CCPA") provides California residents with certain rights regarding their personal information. For example, the CCPA gives California consumers the right to (1) learn about the categories and particular personal information Pentegra has collected about them; (2) obtain a copy of their personal information that Pentegra has collected; and (3) ask Pentegra to delete their personal information.

This section provides Pentegra's privacy notice for California residents. It supplements our Privacy Policy set forth above. Please review Pentegra's Privacy Policy for additional information about how we may obtain and share information collected for other business or legal purposes.

The Personal Information We Collect

During the preceding 12 months, through this site and other sources, Pentegra may have collected the categories of information about California residents (including, for example, current, former and prospective employees, and current, former and prospective clients) detailed in our Privacy Policy under the heading, "Information We Collect." That collection may have included the following information:

- Identifiers and certain "Personal Information" as defined in California Civil Code section 1798.80, subsection (e);
- Characteristics of protected classifications under California law;
- Commercial information;
- Biometric information;
- Professional or employment-related information; and
- Internet or other electronic network activity information.

Purpose of Collecting Consumer Information – How We Use It

Pentegra uses the information it collects about California residents for the reasons and pursuant to the terms detailed in our Privacy Policy under the heading, "How We Use Your Information" and "How We Share Your Information." Please read that section of Pentegra's Privacy Policy carefully.

How California Residents Can Exercise Their Rights Under the CCPA

As mentioned above, California residents have the right to (1) learn about the categories and particular personal information Pentegra has collected about them; (2) obtain a copy of their personal information that Pentegra has collected; and (3) ask Pentegra to delete their personal information. This section explains how to exercise those rights.

Requests For Access To Information Collected About You By Pentegra

If you would like to make a request that Pentegra disclose to you information about our collection or use of your personal information, you may call our CCPA consumer request line at (888) 636-7083. You can also send us an email at ccparequests@pentegra.com or submit a

request through our website by clicking [this link](#). Please note, Pentegra may need to obtain specific information from you to confirm your identity and to ensure that you have the right to access information and exercise certain rights under the CCPA. As a result, a Pentegra representative may contact you to request additional information to verify your identity.

Disclosure of Information

Once your identity is verified, Pentegra will disclose to you the personal information you have requested, including:

- The categories of personal information about you that Pentegra has collected;
- The specific pieces of personal information about you that Pentegra has collected;
- The categories of sources from which Pentegra collected your personal information;
- Pentegra's business or commercial purpose(s) for collecting your personal information;
- The categories of third parties with whom Pentegra shared your personal information; and
- If we disclosed personal information about you for a business purpose, the categories of information that each category of recipient received.
- Deletion of Information

Once your identity is verified, you can request that we delete the personal information we have collected from you. There are certain exceptions and Pentegra reserves the right to deny your request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected your information, provide a service requested by you, continue the ongoing business relationship with you within the reasonably anticipated context of that relationship, or perform a contract between you and Pentegra;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another California resident to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws;
- Enable solely internal uses that are reasonably aligned with the expectations of you based on your relationship with us;
- Comply with legal obligations;
- Otherwise use your information, internally, in a lawful manner that is compatible with the context in which you provided the information; or
- Provide employment and related benefits.

California Residents' Right to Opt Out or Opt In

California residents have the right to opt out of having their personal information sold to third parties. As stated above in Pentegra's Privacy Policy, we do not currently sell your information and we have not done so in the preceding 12 months. As described above in this notice, we may share your personal information with other entities for business or commercial purposes.

Appointment of Agent to Assist You

You have the right to appoint an agent to make requests under the CCPA to obtain or delete information about you. Such authorization must be done in writing and Pentegra may deny a request if the agent does not submit sufficient proof that you authorized the agent to act on your behalf.

California Residents' Right of Non-Discrimination

Pentegra may not discriminate against a California resident because the resident exercised rights under the CCPA, including, but not limited to, by:

- Denying you goods or services;
- Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Providing you a different level or quality of goods or services; or
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.