

# Ascensus College Savings Privacy Statement

Protecting your privacy is a top priority at Ascensus College Savings. We want you to understand how we handle the personal information about you that we may obtain and the high standards we employ to safeguard this information. The Ascensus College Savings companies: Ascensus College Savings Recordkeeping Services, LLC, Ascensus Broker Dealer Services, Inc. and Ascensus Investment Advisors, LLC, collect personal information on 529 plan web sites in our capacity as service providers on behalf of state administrators of 529 plans or on behalf of other entities that provide services to 529 plans (each, a "529 Plan Administrator"), as well as through other web sites that we maintain. This statement covers all of the information handling practices for the Ascensus College Savings companies (referred to herein collectively as "Ascensus College Savings", "we" or "us"). This statement covers our practices in connection with your use of the ascensuscollegesavings.com web site. Although this statement generally reflects our practices with respect to the 529 plan web sites that we maintain, each 529 Plan Administrator may have differing practices; therefore please refer to the 529 plan web site for information relating to the privacy practices for a specific 529 plan.

## Information We May Obtain.

We may obtain your personal information from the following sources:

- **Information you provide to us** on applications and other forms, that you otherwise enter on a 529 plan web site or other web sites that we maintain, or that you provide to us in writing or by telephone, such as when you contact a 529 plan's customer service center. This information may include items such as your name, your beneficiary's name, address, email address, telephone number, banking information, your social security number, and your beneficiary's social security number. In addition, please see **Use of Cookies and other Technologies** below for information we receive automatically when you visit a 529 plan web site or other web sites that we maintain.
- **Information from your transactions** with us, our affiliates or nonaffiliated third parties.
- **Information from third parties**, including public sources, such as verification services and consumer reporting agencies (to comply with regulatory requirements, help ensure the accuracy of data and prevent fraud, for example), or from other sources (such as from other institutions like a bank or broker you use to transfer funds into a 529 plan account, or public sources).

We use the information we obtain primarily to process transactions in your accounts, and to fulfill legal and regulatory requirements. With a 529 Plan Administrator's consent, we may also use this information to offer products and services related to your 529 plan account.

You may request copies of personally identifiable information collected from you through your visits to or use of a 529 plan web site or other web sites that we maintain, or request that such personally identifiable information be removed by contacting us at the address indicated at the end of this policy or, with respect to information submitted through your use of a 529 plan web site, by contacting a customer service representative for the applicable 529 plan.

## Security of Your Personal Information

Ascensus College Savings is committed to earning and keeping your trust. We understand the need

for your personal information to remain secure and private, and we have implemented policies and procedures designed to safeguard your information. We restrict access to nonpublic personal information about you to those employees who need that information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards to guard your nonpublic personal information.

Please remember that you also play a valuable part in data security. You should never share your 529 plan account information, user name or passwords with anyone. If you feel your password has been compromised, you should change it immediately. After you have finished using a 529 plan web site, you should log out of your 529 plan account and exit your browser so that no unauthorized persons can use the 529 plan web site under your name and account information. Further, you are responsible for maintaining the confidentiality of any account information, user names, logins, passwords, and security questions and answers that you use to access any page or feature on a 529 plan web site or other web sites we maintain, and for logging off of your account and any protected areas of a web site we maintain. If you become aware of any suspicious or unauthorized conduct, you agree to contact Ascensus College Savings immediately.

Email submissions over the internet may not be secure. Please consider this fact before emailing any personal or confidential information.

### **How We Handle Your Personal Information**

We do not provide your information to any affiliated or unaffiliated third parties to enable them to market their products and services directly to you, nor do we share your information with affiliated or unaffiliated third parties other than for everyday business purposes such as to process your transactions, maintain your accounts, respond to court orders and legal investigations or report to credit bureaus.

### **Use of Cookies and other Technologies**

Our web servers place and read "cookies" on the 529 plan web sites and other web sites that we maintain for a variety of purposes. Cookies are small data files that are stored on an Internet user's web browser by a web server. One important use of cookies is to help identify you while you are logged onto a 529 plan web site or other web sites that we maintain. Consequently, if your browser does not accept cookies, you may be unable to enroll or log onto the 529 plan web sites and other web sites that we maintain. You will, however, be able to browse the 529 plan web sites and other web sites that we maintain as a visitor. The information Ascensus College Savings collects from cookies and web server logs is used to administer your account and customize information you receive when visiting a 529 plan web or other site we maintain. Ascensus College Savings may also use and share aggregate information from cookies and web server logs to analyze and improve our web service offerings. This information does not identify individual visitors or customers.

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include the internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, to administer the 529 plan web sites and other web sites that we maintain, to track users' movements around the web sites and to gather demographic information about our user base as a whole.

We employ cookies and/or small pieces of code known as "web beacons" or "clear gifs" that, on an anonymous basis, count users that have visited a page that contains these web beacons. We use web beacons to help us better manage content on the 529 plan web sites and other web sites that we maintain and to determine which content is effective. Web beacons on the 529 plan web sites

and other web sites that we maintain are not used to collect personally identifiable information about you. Finally, we may use web beacons in our HTML-based emails to let us know which emails have been opened by recipients so that we may gauge the effectiveness of our communications. If you would like to opt-out of these marketing emails, please see the instructions in the email regarding how to opt-out.

If you have not opted-out of receiving marketing messages, we may use information from our log files, cookies or web beacons to help us make those communications more useful or interesting to you.

As a result of your accessing the 529 plan web sites and other web sites that we maintain, we may collect information about your web site usage. We utilize this data in conjunction with data from the rest of our online visitor population to determine how to provide better products or services. The reports which are created from web site usage information contain aggregate visitor statistics and will not personally identify you.

### **Choices Regarding the Receipt of Marketing Messages**

You may choose whether and to what extent you receive marketing messages from us related to a 529 plan. If you do not wish to receive marketing messages, you may opt out by following the instructions in the email regarding how to opt-out. We reserve the right to send you specific administrative notices that are required by law, regulation, or as needed to service your 529 plan account.

### **Collection of Information from Children**

None of the 529 plan products or services we offer or maintain is intended for purchase by children. In addition, we do not knowingly collect, either online or offline, personally identifiable information from children under the age of 13.

### **Changes to This Privacy Statement**

If we materially change this statement or our information-handling practices as described in this statement, we will notify you by email and/or through a notice on the 529 plan web sites, as applicable.

### **Additional Rights**

In addition to the rights described in this policy, please note that you may have additional rights under state law.

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