### **Ascensus Privacy Statement**

Protecting your privacy is a top priority at Ascensus. 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 following Ascensus companies: Ascensus College Savings Recordkeeping Services, LLC, Ascensus Broker Dealer Services, LLC and Ascensus Investment Advisors, LLC, collect personal information on web sites of 529 plans, ABLE plans, and state sponsored retirement plans in our capacity as service providers on behalf of state administrators of such plans or on behalf of other entities that provide services to such plans (each, a "Plan Administrator"), as well as through other web sites that we maintain. This statement covers the information handling practices only for the Ascensus companies named above (referred to herein collectively as "Ascensus ", "we" or "us"). This statement covers our practices in connection with your use of other websites that we maintain, including, without limitation, howtosaveforcollege.com, Ugift529.com, and Ugiftable.com. Although this statement generally reflects our practices with respect to the plan web sites that we maintain, each Plan Administrator may have differing practices; therefore please refer to the plan web site for information relating to the privacy practices for a specific 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 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 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 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 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 Plan Administrator's consent, we may also use this information to offer products and services related to your plan account. We may also use this information to offer information and services related to products or services that we offer or administer. You may opt out of any marketing communications as further described herein below.

You may request copies of personally identifiable information collected from you through

your visits to or use of a 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 plan web site or other websites we maintain, by contacting a customer service representative for the applicable plan or web site.

### **Security of Your Personal Information**

Ascensus 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 and comply with applicable security and privacy laws and regulations for the handling, processing and protection of nonpublic personal information.

Please remember that you also play a valuable part in data security. You should never share your 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 web site, you should log out of your account or user profile and exit your browser so that no unauthorized persons can use the web site under your user 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 plan web site or other web sites we maintain, and for logging out of your account, user profile, 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 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 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 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 plan web sites

and other web sites that we maintain. You will, however, be able to browse the plan web sites and other web sites that we maintain as a visitor. The information Ascensus collects from cookies and web server logs is used to administer your account and customize information you receive when visiting a plan web or other web site we maintain. Ascensus 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.

However, as is true of most web sites, we gather certain information about your computer 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 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 plan web sites and other web sites that we maintain and to determine which content is effective. Web beacons on the plan web sites and other web sites that we maintain are not designed 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 or as otherwise provided 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 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 plan or otherwise. If you do not wish to receive marketing messages, you may opt out by following the instructions in the email or as otherwise provided 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 plan account or online user profile.

## **Collection of Information from Children**

None of the 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 plan web sites or the other web sites that we maintain, 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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