

## PRIVACY POLICY

The words “we,” “us,” and “our” refer to ProManage, LLC (“ProManage”), a registered investment adviser, and its affiliates, agents and third parties. The words “you” and “your” mean you, the individual visiting or using our Financial Wellness mobile application, website or related services (collectively, “Services”), including but not limited to the *Vision* website and any data contained therein.

ProManage is committed to your privacy protection. We want you to feel comfortable about security as you use our Services. This Privacy Policy describes our privacy practices with respect to (a) confidential health information as described in our HIPAA Privacy Notice, and (b) other personal information as described in our General Privacy Policy (both available at <https://promanageplan.com/financialwellness/>), both of which are set forth below (collectively, our “Privacy Policy”). **By using or accessing the Services or otherwise providing health or other personal information to us, you signify your acknowledgment and assent to this Privacy Policy, and consent to the collection, processing and use of your personal information as described. If you do not agree to this Privacy Policy or such terms, please do not use the Services or otherwise provide personal information to us.**

### GENERAL PRIVACY POLICY

This General Privacy Policy describes ProManage’s privacy practices with respect to other personal information not covered by our HIPAA Privacy Statement (<https://promanageplan.com/financialwellness/>). As used in this General Privacy Policy, “personal information” means data that identifies, relates to, describes, or that could be linked to a particular identified or identifiable natural person or is otherwise considered personal information under applicable privacy and/or data protection laws or regulations (other than HIPAA).

#### **Protected Data Storage**

The personal information you provide while using the Services is stored in a secured, password-protected location on encrypted devices.

#### **Nondisclosure of Personal Information**

We will not sell, reveal or share your personal information with third parties except in the following limited circumstances:

- We have your permission to share the information;
- We need to share your information with companies who work on our behalf to provide a product or service you have requested or to maintain or service your account. For example:
  - We may work with a financial institution, such as your plan administrator, plan sponsor or its recordkeeper/custodian, to make services available to you or effect a transaction you have requested.

- If you have consented or otherwise requested to receive e-mail or other electronic communications from us, we may provide your e-mail address to companies that perform mailing services for us. (Unless we tell you differently, these companies do not have any right to use the personally identifiable information we provide to them beyond what is necessary to assist us.);
- We are required or authorized by law to disclose your information (for example, to comply with a subpoena or regulatory requirement, or to protect against fraud or illegal activity or for institutional risk control or the safety of plan participants and their property);
- We need to provide information to our attorneys, accountants and auditors or others determining compliance with industry standards;
- We reserve the right to disclose personal information in special cases when we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury or interference with (either intentionally or unintentionally) our rights or property or anyone else that could be harmed by such activities; or
- In the event ProManage or its affiliates or their assets are sold, merged or otherwise involved in a corporate transaction, your personal information will likely be transferred as part of that transaction – we reserve the right to transfer your personal information in such situation provided that we will make reasonable efforts to see that your privacy preferences are honored by the transferee.

We may anonymize, pseudonymize, aggregate or de-personalize personal information and/or Usage Information to create non-personally identifiable information (“**Anonymized Data**”). We may disclose and use Anonymized Data and other non-personally-identifying information for industry analysis, statistical purposes, demographic profiling, marketing and advertising, and other business purposes (which may include reporting on trends in the usage of the Services).

### **Data Encryption and Security**

We maintain appropriate physical, electronic and procedural safeguards and controls to help protect against the loss, misuse, alteration and unauthorized disclosure of personal information in our possession or under our control. We use industry-standard encryption technologies when storing your data from the Financial Wellness website and mobile application. Our physical facilities where data is stored have security measures in place to protect against the loss, misuse or alteration of information that we have collected from you via the Services. Our database is secured through use of a security architecture, reflecting a customized configuration of hardware and software including a secure firewall and other safeguards. We will comply with all privacy laws and make any legally required disclosures regarding breaches of the security, confidentiality, or integrity of personal information consistent with our ability to determine the scope of a breach and our obligations to law enforcement.

NOTE: You are cautioned to not use e-mail to share any confidential information with us. Use only very long complex passwords and do not use unsecure methods (e.g. public computers, unsecured Wi-Fi networks, et al) to access the Services.

## **Use of Cookies and Usage Information**

We and third-party analytics providers may collect information about your usage and interaction with our Services, including domain name, referring web page, and the length of time spent and the pages accessed while visiting our Services (collectively, “**Usage Information**”). Usage Information may be collected via tags, cookies, device identifiers, IP addresses, and other tracking mechanisms. We use cookies for site administration purposes. We use persistent cookies to assist in identifying you. Temporary cookies are used to provide users with information relevant to them as they use the Services and to permit them to perform multiple operations without having to enter a User ID and Password each time a different function is selected. Temporary cookies are removed when you close your browser. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. However, this may prevent you from taking full advantage of our Services. Usage Information is collected to help us manage and administer our website, Services and systems, improve the content of our products and services, and customize and improve user experience.

## **Specific Data Collection**

For those who voluntarily choose to contact us using the e-mail address available via the Services, we collect your e-mail address. To use the Services (and ProManage’s *Vision* service) you must provide your current e-mail address and other identifying information.

If your retirement plan sponsor or administrator or other employee benefits provider makes our Services available to you, they will or have provided us with information about you and your Account to reduce the amount of data you need to enter. Items provided by your employee benefits provider (e.g. plan sponsor) include but are not limited to certain employee benefits including retirement plan balance and insurance coverage.

We collect information from you upon registration/setup of the Services, and for those who are eligible for *Vision* if you choose to proceed to ProManage’s *Vision* website. At this point, you provide us with personal information, such as your name, e-mail address and some data items to confirm your identity. Upon successful completion of registration and Account setup, you may enter additional information, such as emergency fund, certain types of debt, existence of certain insurance coverage, and certain assets and income.

You have the option to use a third-party service to collect data from specific financial accounts which only you authorize including bank accounts, loans, credit cards, mortgages, et al by providing log in information for its use. If you activate that third-party service’s functionality and authorize connections to any financial accounts, we will receive various data which can include IDs, balances, payments, transfers, interest, rates, transactions, and other detailed financial information regarding the accounts you have authorized. This information will be stored as part of your Account. Before activating such a third-party service, you should review the policies including their Privacy Policy to better understand their practices and inform your decision. You need not use the third-party service to use the Financial Wellness mobile application; you can enter the financial information manually.

If you are eligible and choose to access ProManage's *Vision* website, you will be asked to review and approve disclosures related to that service as part of your registration for the *Vision* service. In *Vision* you may provide your individual financial accounts and pensions not already provided by your retirement plan sponsor or administrator.

Your mobile device may use biometric identifiers to provide you with access to your device or our mobile application. We do not obtain access to these biometric identifiers.

### **How is my information used?**

Your personal and financial information are maintained by ProManage to provide you with the Financial Wellness Services you have requested and to fulfill our legal and regulatory requirements.

By having your personal and financial information, we are better able to track your progress in reaching your financial goals. Therefore, we are able to return better feedback to you.

Any demographic information we collect can be used in aggregated form as Anonymized Data without linking it to any of your personal information. For example, we may use this information for our own research purposes.

We do not collect personally identifiable information about an individual user's online activities over time and across third party web sites, and therefore do not currently employ a process for responding to "Do Not Track" (DNT) signals sent by web browsers, mobile devices, or other mechanisms.

### **Controlled Use of Information**

Personal identifiers (such as User ID and Password) are used to verify your identity for recordkeeping in our system, for authentication of user validity and for other purposes necessary for identification. E-mail addresses can be used for communication purposes including delivery of required legal or regulatory documents and other information. (See our [Disclosure and Consent to Use Electronic Records and Signatures](#).) Aggregate information about your use of the Services may be used to improve the quality and usability of the site.

### **Access to Personal Information**

You may review, update, correct or delete certain personal information associated with your Account by logging into your Account. If you wish to update or delete that personal information, you can contact us using the contact points specified below. To the extent authorized by law, we will take commercially reasonable steps to modify or delete your personal information as soon as is practical, but some information may remain in archived/backup copies for our records or as otherwise required by law. As we process Plan Information and other information provided by our client (the aforementioned provider of employee benefits including retirement plans) we do not generally have the right to disclose, delete or make decisions to modify such data. To modify or delete information provided by your employee benefits provider (e.g. retirement plan sponsor) or a third-party service provider, you should contact them directly.

## **Policy Change Notification**

From time to time, we may alter our Privacy Policy to reflect changes to our information practices. If we make any material changes we will attempt to notify you using the contact information you have provided to us, via your account or the Services, or by means of posting an updated version of this Privacy Policy on the Financial Wellness mobile application and website. We encourage you to periodically review our posted Privacy Policy for the latest information on our privacy practices. Any modifications to this Privacy Policy will be effective upon our posting or notification of the new terms, and your continued use of the Services after notification of the change indicates acceptance of the modified Privacy Policy and reaffirmation of your consent. If you do not agree to any part of a modified Privacy Policy, then you must terminate your Account and stop accessing the Services and otherwise providing personal information.

## **Contact Us**

If you have questions about the above General Privacy Policy, or our Services, please feel free to contact us but do not share confidential information in your e-mail:

Postal Address:  
Privacy Officer  
ProManage, LLC  
130 E. Randolph Street, Suite 2825  
Chicago, IL 60601  
Via E-mail: [compliance@promanageplan.com](mailto:compliance@promanageplan.com)

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