

# **Privacy Policy**

# **Newport Group**

#### Who We Are

Newport Group, Inc. ("Newport Group") provides retirement plan recordkeeping and administration, trust and custody, consulting, fiduciary consulting, investment advisory and institutional insurance services.

## **How We Utilize Your Information**

In the course of providing services to plan sponsors and institutional clients, Newport Group may obtain or have access to confidential information about its clients and potential clients and their representatives and nonpublic personal information about plan participants, insureds and their beneficiaries. Such information is utilized solely to provide the service for which Newport Group was retained.

# **How We Protect Your Nonpublic Personal Information**

Newport Group maintains physical, electronic, and procedural safeguards to protect your nonpublic personal information. Such information may be stored in either hard copy or electronic format (or both). Newport Group utilizes physical, electronic and procedural controls to protect information, and we regularly adapt these controls to respond to changing requirements and advances in technology. Newport Group limits access to nonpublic personal information to only those who require it to develop, support, offer and deliver services to you.

# **Updating Your Nonpublic Personal Information**

Newport Group offers several options for accessing your account information. You can review your information independently using your printed statements, Newport Group's participant website or Newport Group's automated telephone service. You may request that we update your information or speak to a representative by calling the applicable telephone numbers shown in other parts of this website.

## **How We Share Information**

Unless otherwise authorized by the plan sponsor or plan participant, Newport Group does not share nonpublic personal information about its customers with third parties for use in marketing their products or services. Newport Group may share nonpublic personal information with its affiliates and third-party service providers performing services relating to your account. These third-party service providers are required by both federal and state law to maintain strict privacy policies. In addition, these service providers are obligated by agreements with Newport Group to keep the nonpublic personal information we share with them confidential.

From time to time, Newport Group may be required to share nonpublic personal information with federal, state or local regulatory agencies. Newport Group may also be required to share nonpublic information pursuant to a court order requiring disclosure in connection with a court proceeding that involves an account for which Newport Group provides services.

#### **Privacy and our Website**

Privacy, security and service in its online operations are a cornerstone of Newport Group's business environment for its customers. Newport Group utilizes the safeguards described in this Privacy Policy, along with firewall barriers, authentication procedures and other means, to maintain the security of your online session and to protect your accounts and our systems from unauthorized access.

# **Accessing our Website**

The Newport Group website is located at <a href="www.newportgroup.com">www.newportgroup.com</a>. By using this website, you agree to abide by the <a href="Terms of Use">Terms of Use</a> that may from time to time be posted on the website. If you do not agree to these Terms of Use, you should not access or use the website.

# **Collection of Nonpublic Personal Information on our Website**

Newport Group does not collect nonpublic personal information from you as you browse this website, other than as described in this paragraph. We collect account-related information that you submit on this website, such as updated personal information provided as described above, and trade or transactional activity in your account. Newport Group may also collect information from your use of planning tools available on this website to facilitate your use of these tools, but Newport Group does not use any of this information for marketing purposes. We gather and analyze data regarding the use of this website, including domain name, pages visited, length of user session, etc., to help us stay abreast of technical upgrades that can make this website more accessible to visitors, and to record the date and time of your visit to this website.

## Cookies

We may utilize "cookies" for security purposes, to facilitate website navigation, and to personalize your experience on this website. Internet "cookies" are messages that a web server gives to your web browser in connection with your visit to a website. The message contains information, in the form of lines of text, that is then stored on your hard drive. When you click on a hyperlink, the website transmits a cookie to your browser; when you return to the page or website that transmitted the cookie, the information is transmitted back to the website's server. We do not use cookies to store confidential or sensitive information on your computer, or to capture your email address, obtain data from your hard drive, or gain confidential or sensitive information about you.

#### **E-Mail Communications**

If, in interacting with this website, you actively transmit to us by electronic mail information such as your email address, your account number, or information concerning your account, to enable you or us to perform certain services, we will retain the content of the form or email, the email address and our response. This allows us to keep a record of our contact and provide you with the product, service or information that you may have requested.

#### **Website Usage Information**

We may collect and use data regarding visitors' usage of this website for editorial and feedback purposes, for statistical analysis of visitors' behavior, for product development, for content improvement, and to customize the content and layout of this website. The data regarding usage of this website is maintained on an aggregated basis without identifying information.

#### **Linked Websites**

This website contains links to other websites and other websites may link to this one. Third parties providing services to plan participants through Newport Group website may access via this website nonpublic personal information from Newport Group databases, but only with plan participant's prior written authorization. Linked websites may contain privacy or confidentiality provisions or security measures that differ from those provided on this website. Newport Group is not responsible for such provisions or measures, and expressly disclaims any and all liability related to such provisions.

# **Mobile Applications**

We may from time to time make available mobile applications ("Apps") to allow you to access your account using wireless and mobile devices. This Privacy Policy applies to any nonpublic personal or other information that we may collect through Apps.

### Questions

If you have questions regarding this Privacy Policy, please contact us via email at informationsecurityoffice@newportgroup.com.

# **Changes to Privacy Policy**

Newport Group reviews this Privacy Policy periodically and may make changes or update this policy at any time and from time to time without prior notice. Any changes will be effective upon posting.

Persons who access the Newport Group website do so at their own initiative, and are responsible for compliance with applicable laws and regulations.

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