

PRIVACY POLICY

LAST UPDATED: March 5, 2020

PUBLIC EMPLOYEE RETIREMENT ASSISTANCE PRIVACY POLICY

Public Employee Retirement Assistance, LLC (“PERA”, “us” or “we”) value our customers and respect your privacy and want you to be familiar with how we collect, use, and disclose information. This Privacy Policy (“Policy”) describes our practices in connection with information that we may collect through our websites and mobile software applications operated by or on behalf of PERA, including the website located at <http://publicemployee retirementassistance.com>. This website and mobile apps are referred to collectively in this Policy as the “PERA Online Properties.” This Policy applies to the PERA Online Properties regardless of the applicable PERA brand. This Policy applies to any subsidiary or affiliate companies (“PERA Affiliates”).

This Policy also applies to information collected through off-line means – such as information collected through our galleries, call centers, or distribution centers, if applicable, which are collectively referred to in this Policy as “PERA Physical Properties.”

This Policy applies to all of the services offered by PERA and its Affiliates but excludes services that have separate privacy policies that do not incorporate this Policy. This Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you, or other sites linked from our services. Our Policy does not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, pixel tags, and other technologies to serve and offer relevant ads.

We encourage you to read this Policy before visiting PERA Physical Properties, using the PERA Online Properties, or providing information to us. By using the PERA Online Properties, visiting PERA Physical Properties, or providing information to us, you understand that we will collect, use, and disclose your information in accordance with this Privacy Policy.

UPDATES TO THIS POLICY

We may amend or make changes to this Policy at any time. Please take a look at the “*Last Updated*” legend at the top of this page to see when this Policy was last revised. Any changes to this Policy will become effective on the “*Last Updated*” date indicated above. By using the PERA Online Properties or providing information to us following such changes, you will be deemed to have accepted the revised Privacy Policy.

PERSONAL INFORMATION

PERSONAL INFORMATION WE COLLECT

We collect two types of information: Personal Information and Other Information. “**Personal Information**” or “**PI**” is information that relates to you as an identifiable specific individual. “**Other Information**” or “**OI**” is any information that cannot be tied back to you as a specific individual. Other Information is addressed below, under the heading “*Other Information*.”

We and our service providers **may** collect the following Personal Information:

- IP Addresses;
- Device Information/Locating Information; and
- Region

IF YOU SUBMIT ANY PERSONAL INFORMATION RELATING TO ANYONE OTHER THAN YOURSELF, YOU REPRESENT THAT YOU HAVE OBTAINED ANY NECESSARY CONSENT FROM THAT INDIVIDUAL FOR USE AND DISCLOSURE OF THAT INDIVIDUAL’S PERSONAL INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY.

HOW WE COLLECT PERSONAL INFORMATION

We may collect PI from a number of sources. While we may collect PI from you directly, we can also use third-party sources of information in order to fulfill the purposes set out in this Policy. These sources can include, but not be limited to our website, software, and mobile applications, as well as from third parties and other publicly available sources of information. While we may collect PI from these sources, we will only use and disclose PI in accordance with this Policy. We may also collect from the following sources:

- Credit reporting agencies (if you are applying for credit with us);
- Financial institutions (e.g. your credit card company or your bank);
- Previous employers (if you are applying for a job with us);
- Background screening companies (if you are applying for a job with us);
- Our services providers;
- Marketing partners; or
- Marketing and advertising agencies and networks.

HOW WE USE PERSONAL INFORMATION

Depending on the purpose, we may use various categories of information on order to achieve the effects expected by both you and PERA. As such, it is difficult to specifically state which category of data will be used for which purpose as the context and circumstances may mandate that we use PI for multiple purposes. As such, we find it more useful to describe the purposes we and our service providers may use any PI we have collected about you. To that end, we may use PI to:

- Respond to your inquiries and fulfill your requests, including to contact you if necessary;
- Process and fulfill orders, for example by confirming your order for business cards and your billing and shipping information, processing your payments, delivering your products and communicating with you regarding your order;
- Send you important information regarding the PERA Online Properties, changes to our terms, conditions and policies, and other administrative information;
- Send you information by email, U.S. Mail, telephone, and other means about our services, contests, and other promotions;
- Administer and fulfill our contests, and other promotions (please note that certain contests, or other promotions may have additional rules or policies, which may contain different or additional information about how we use and disclose your personally identifiable information; we suggest that you read any such rules or policies carefully – in the event of a conflict between such rules or policies and this Policy, such rules or policies shall govern);
- Help us improve the customer experience, including by learning more about your preferences to help personalize your experience with us;
- Allow you to send messages through PERA Online Properties (please note that, by using such functionality, you are agreeing that you have the right to provide to us your friend's name and email address for such purpose) to NBC or back office;
- Analyze trends and statistics in connection with our businesses and internet properties, including to measure the success of marketing campaigns and to compile statistics about usage and response rates;
- Protect the security or integrity of our businesses and Internet properties; and
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our subsidiary companies subsidiaries of PERA); (f) to protect our rights, privacy, safety or property, or that of you, our Affiliates or others; and (g) to allow us to pursue available remedies or to limit the damages that we may sustain.

HOW PERSONAL INFORMATION IS SHARED

Similar to how we use PI, we may share PI to service providers, and sometimes third parties, for various purposes. To this end, we may disclose your PI to the following entities for the purposes associated with each entity as noted below:

- To our third-party service providers, who provide services such as website hosting, data storage, data analysis, payment processing, order fulfillment, IT services and infrastructure, customer service, email delivery and administration, credit card processing, auditing, and other similar services to enable them to provide services;
- To our subsidiaries and Affiliates for marketing and other purposes;
- To selected third parties ("Promotional Partners"), to permit them to send to you marketing communications. PERA seeks to select as Promotional Partners only reputable companies that offer what we believe to be high-quality products and services;
- To identify you to anyone to whom you send messages through the PERA Online Properties;
- By you, on message boards, chat, profile pages, blogs, and other services to which you are able to post information and materials (please note that any information and materials that you post or disclose through such services will become public information, and may be available to visitors to the PERA Online Properties and to the general public; we urge you to be very careful when deciding to disclose your Personal Information, or any other information, on or through the PERA Online Properties);
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceeding); and
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and

conditions; (e) to protect our operations or those of any of our Affiliates; (f) to protect our rights, privacy, safety or property, or that of you, our Affiliates or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

HOW WE PROTECT AND STORE PERSONAL INFORMATION

SECURITY

We have implemented and maintain appropriate technical and organizational security measures, policies and procedures designed to reduce the risk of accidental destruction, or loss, or unauthorized disclosure or access to such information appropriate to the nature of the information concerned, including:

- Where appropriate: password protection, encryption, and use of secure communication transmission software (known as "transport layer security" or "TLS") to protect our Sites;
- Placing confidentiality requirements on our employees and service providers;
- Destroying or permanently anonymizing personal information if it is no longer needed for the purposes for which it was collected; and
- Following strict security procedures in the storage and disclosure of your personal information to prevent unauthorized access to it. While we take appropriate technical and organizational measures to safeguard your personal information, no transmission over the Internet can ever be guaranteed to be secure. Therefore, we cannot guarantee the security of any personal information that you transfer over the Internet to us and any such transmission is at your own risk.

As the security of PI depends in part on the security of the computer you use to communicate with us and the security you use to protect usernames and passwords, you should take steps to protect against unauthorized access to your password, computer, and web-enabled devices, among other things, by signing off after using a shared computer, inserting a password on your web-enabled device, choosing a password that nobody else knows or can easily guess, keeping your password private, and periodically changing your password. You should never share your log-in information with others. We are not responsible for any lost, stolen or compromised passwords, or for any activity on your account via unauthorized password activity.

STORAGE

We will store your PI for as long as is reasonably necessary for the purposes for which it was collected, as explained in this Policy. Where your information is no longer needed, we will ensure that it is disposed of in a secure manner. In some circumstances we may store your personal information for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, and accounting requirements, as necessary. In specific circumstances we may store your PI for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

OTHER INFORMATION WE MAY COLLECT

Other Information ("OI") is any information that does not generally identify you as a specific individual, such as:

- Browser information;
- Server log files;
- Information collected through cookies, pixel tags, and other technologies;
- Physical location of your device;
- Demographic information and other non-personally identifiable information provided by you; and
- Aggregated information

Sometimes "Other Information" is actually capable of being connected to you as a specific individual. If that is the case, then the information is not "Other Information" but is "Personal Information," and will have the same kinds of protections as Personal Information.

HOW WE MAY COLLECT OTHER INFORMATION

We and our third-party service providers may collect OI in a variety of ways, including:

- Through your browser: Certain information is collected through most devices, such as your Media Access Control ("MAC") address, device manufacturer and model, device identifier, screen resolution, and the type and version of your operating system and browser;
- Through server log files: an Internet Protocol ("IP") address is a number that is automatically assigned to a device by an Internet Service Provider ("ISP"), and is identified and logged automatically in our server log files whenever a user visits the PERA Online Properties, along with the time of the visit and the page(s) that were visited. We and our service providers use IP addresses for purposes such as calculating usage levels, helping diagnose server problems and administering the PERA Online Properties;

- Using cookies: Cookies allow a web server to transfer data to a device for recordkeeping and other purposes. We and our service providers use cookies and other technologies to, among other things, enhance and personalize your online browsing and shopping experience and facilitate your ongoing access to and use of the PERA Online Properties, as well as for online tracking purposes. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to decline the use of cookies. If you choose to decline cookies, some or all of the features, functionality and promotions available through the PERA Online Properties – such as the shopping cart, ability to view certain pages, and even placing orders or reviewing your order history – may not be available to you;
- Analytics. We may use third-party services, such as Google Analytics or IBM Coremetrics, in connection with the PERA Online Properties. Such services use cookies and similar technologies to analyze how visitors use the PERA Online Properties, to compile statistical reports on activity related to the PERA Online Properties, and to provide other services related to the PERA Online Properties. Such services may also collect information about visitors' use of other websites or other online resources. For more information about Google Analytics, including how to opt out, please go to: <https://tools.google.com/dlpage/gaoptout>. For more information about IBM Coremetrics, you may review its privacy policy located at: <http://www.ibm.com/privacy/us/en/>;
- Flash Local Stored Objects: We and our service providers may use a third-party technology, called Flash, in connection with the PERA Online Properties, including our online content. Flash provides a facility, referred to as Local Stored Objects ("LSO"), that allows a website operator or online content provider (or their service providers) to store certain information locally on an individual's device; for example, Flash LSOs can be used to store information regarding an individual's device. If you do not want Flash LSOs stored on your device, you can adjust the settings of your Flash player to block Flash LSO storage using the Website Storage Settings Panel. You can also control Flash LSOs by going to the Global Storage Settings Panel and following the instructions (which may include instructions that explain, for example, how to delete existing Flash LSOs (referred to as "information" on the Macromedia site), how to prevent Flash LSOs from being placed on your device without you being asked, and (for Flash Player 8 and later) how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with the PERA Online Properties. We expect our service providers and technology suppliers to honor any decision by you to restrict or limit Flash LSOs, but we cannot guarantee that they will do so;
- Using pixel tags and other similar technologies: Pixel tags (also known as Web Beacons and clear GIFs) are small images that may be used by us and our service providers in connection with some pages of the PERA Online Properties and HTML-formatted email messages to, among other things, render such pages to you on various hardware devices and operating system versions, track the actions of users and email recipients, measure the success of marketing campaigns and compile statistics about usage and response rates. Pixel tags may collect information such as the pages, features and links accessed by a user, and the IP address, browser type and operating system of such user's device;
- Physical location: We and our service providers may collect the physical location of your device by, for example, using satellite, cell phone tower or Wi-Fi signals. We may use your device's physical location to provide you with personalized location-based services and content, including for marketing purposes, based on the choices that have been made with respect to such uses. We may also share your device's physical location, combined with information about what advertisements you viewed and other information we collect, with our third-party marketing partners, such as our Promotional Partners, to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns, based on the choices that have been made with respect to such disclosures. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location, but if you choose to deny such uses and/or sharing, we, our service providers, and/or our third-party marketing partners may not be able to provide you with the applicable personalized services and content;
- From you: We and our service providers may collect demographic information such as your city, state or zip code of residence, as well as other information, such as your preferred means of communication, your gender and your date of birth, when you voluntarily provide this information to us or our service providers. You may also have the opportunity to provide us with information regarding major events such as weddings, child births and the purchase of a new home. We also maintain a record of your orders, purchases, exchanges, returns, wish lists and gift registries in connection with the PERA Online Properties or our businesses. Unless combined with Personal Information, this information does not personally identify you or any other customer or potential customer of our businesses; and
- By aggregating information: We and our service providers may aggregate PI collected from our customers and potential customers, for example by using PI to calculate the percentage of such individuals who have a particular telephone area code. Aggregated PI does not personally identify you or any other customer or potential customer.

We may use and disclose OI for any purpose. In some instances, we may combine OI with PI (such as combining your zip code with your name). If we combine any OI with PI, the combined information will be treated by us as PI while it is so combined.

THIRD-PARTY AND THIRD-PARTY SITES

To the extent that you submit any PI to any third party (for example, via a third-party software application or service — including any social media service — that is included in, available through or linked to from the PERA Online Properties), such third-party's collection, use, and/or disclosure of such information may be governed by its privacy policy, and not by our Policy. We recommend that you familiarize yourself with the privacy policies and practices of any such third parties.

IMPORTANT: WE ARE NOT RESPONSIBLE FOR THE INFORMATION COLLECTION, USAGE, DISCLOSURE, OR OTHER PRIVACY PRACTICES OF ANY THIRD PARTIES, INCLUDING OUR AFFILIATES, THIRD-PARTY SERVICE PROVIDERS, ANY THIRD-PARTY SOCIAL MEDIA PLATFORM (SUCH AS FACEBOOK INC.), ANY THIRD PARTY MAKING AVAILABLE THE DEVICES OR OPERATING SYSTEMS FOR WHICH CERTAIN PERA ONLINE PROPERTIES ARE AVAILABLE (SUCH AS APPLE INC. OR GOOGLE INC.) AND ANY THIRD-PARTY OPERATING ANY SITE TO WHICH THE PERA ONLINE PROPERTIES CONTAIN A LINK. THE INCLUSION OF A LINK ON THE PERA ONLINE PROPERTIES DOES NOT IMPLY ENDORSEMENT OF THE LINKED SITE BY US OR BY OUR AFFILIATES.

“DO NOT TRACK” SIGNALS

We note that the PERA Online Properties will continue to operate as described in this Policy, whether or not a “Do Not Track” signal or similar mechanism is received from your browser.

SECURITY

We seek to use reasonable organizational, technical, and administrative measures to protect PI under our control. For example, we seek to use Secure Sockets Layer (“SSL”) technology for the placement of orders. Unfortunately, no data storage system or data transmission over the internet can be guaranteed to be 100% secure. Please also be aware that we may use third-party cloud service providers that provide hosting, data storage and other services pursuant to standard terms and conditions that may be non-negotiable; these service providers have informed us or the general public that they apply security measures they consider adequate for the protection of information within their system, or they have a general reputation for applying such measures.

Please exercise caution in submitting PI via the PERA Online Properties, especially if you are accessing the PERA Online Properties using a Wi-Fi hotspot or public network. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account that you might have with us has been compromised, or if you are unable to utilize our SSL technology in connection with the PERA Online Properties), please immediately notify us of the problem and place any orders with us over the telephone or in person, instead of using the PERA Online Properties. You may contact us in such circumstances in accordance with the “Contact Us” section on our website.

YOUR PRIVACY RIGHTS

YOUR RIGHTS REGARDING OUR USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION

You have certain rights regarding our use and disclosure of your PI, regardless of whether such information is collected by us through the PERA Online Properties or otherwise. While these rights are not absolute, you generally have the right to request deletion of PI when there is no longer a legitimate reason to keep it. You can exercise these rights as follows:

- *Receiving promotional emails or catalogs from us:* If you no longer want to receive promotional emails (such as information about new products, special offers and sales events) or catalogs from us on a going-forward basis, you may “unsubscribe” from receiving such communications by: clicking the “unsubscribe” link in any promotional email; or contacting us in accordance with the “Contact Us” section on the website. In each case, please remember that, if you wish to unsubscribe from receiving all promotional emails from PERA, you may need to unsubscribe separately with each PERA brand. When so contacting us, please be sure to include your full name and the email and/or postal address that you used when registering or making a purchase;
- *Our sharing of your Personal Information with Affiliates, Promotional Partners and other third parties for their marketing purposes:* If you no longer want us to share your PI on a going-forward basis with our Affiliates, Promotional Partners and other third parties for their marketing purposes, you may opt-out of such sharing by contacting us in accordance with the “Contact Us” section on our website. In so contacting us, please be sure to include your full name and the contact information that you no longer wish to be shared, and state specifically whether you wish to opt-out of such sharing with: (a) Affiliates; (b) Promotional Partners and other third parties; or, (c) both. Additionally, we may need to ask for additional information in order to ensure that the PI related to your opt-out request actually relates to you and not some other person;

- *Deletion of Personal Information which is no longer a legitimate reason for us to keep it.* If you no longer want us to retain your PI on a going-forward basis, you may request deletion of PI by contacting us in accordance with the “Contact Us” section on our website. In so contacting us, please be sure to include your full name and the contact information that you wish to be deleted, and state specifically whether you wish to opt-out of such sharing with: (a) Affiliates; (b) Promotional Partners and other third parties; or, (c) both. Additionally, we may need to ask for additional information in order to ensure that the PI relating to your deletion request actually relates to you and not some other person.

Please Note: there are a number of reasons which PERA will retain your PI even if you make a deletion request. Generally, these reasons are in order to defend a legal right or respond to a legal claim. However, applicable law also permits retention for our own internal business needs. If we decline to delete data after you have requested deletion, we will respond to you with our reasons, and explain how your PI will still be protected so long as we retain it.

- *Access or Changing Your Personal Information.* We welcome your willingness to update your information with us. You may review or ask us to update your PI by contacting us in accordance with the “Contacting Us” section below. Further, you may ask for a copy of the Personal Information we have collected about you for the last 12 months. In your request, please make clear what information you would like to have changed. Additionally, we may need to ask for additional information in order to ensure that the PI you are accessing actually relates to you and not some other person. We will try to comply with your request as soon as reasonably practicable. We are not responsible for changing information in the databases of Affiliates, Promotional Partners and other third parties with whom we have already shared your PI. Note that you may not request copies of your PI more than twice a year.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out as described above, we will not be able to remove your PI from the databases of our Affiliates, Promotional Partners and other third parties with which we have already shared your PI (i.e., to which we have already provided your PI as of the date that we implement your opt-out request). Please also note that if you do opt-out of receiving marketing-related messages from us, we may still send important administrative messages to you, and you cannot opt-out from receiving such administrative messages. For example, when you place an order, we will continue to confirm your order and shipment status by email. We may also need to contact you via telephone, email or postal mail with information or questions regarding your order.

- *Appointment of an Agent.* You have the right to appoint an agent to exercise all your rights under this Policy. However, appointment of an agent is a serious thing. As a consequence, we will require you to not only properly identify yourself and the information which relates to you, but we will require you to give PERA sufficient PI about your agent so that we may identify them as well.

USE OF PERA ONLINE PROPERTIES BY MINORS

This site is not intended for use by children. We do not intentionally gather PI about visitors under the age of 16, and we request that they not provide PI through our website. If a child has provided us with PI, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under age 16, please contact us at info@publicemployeeretirementassistance.com. If we learn that we have inadvertently collected the PI of a child under 16, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible.

JURISDICTIONAL ISSUES

The PERA Online Properties are controlled and operated by us from the United States and is not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States.

CONTACT US

If you have any questions about this Policy, or to make choices about receiving promotional communications, to update your PI, or to place an order, please contact the appropriate PERA brand as follows: info@publicemployeeretirementassistance.com. Please note that email communications are not always secure; so please do not include credit card information or other sensitive information in your email messages to us.