

## PRIVACY AND SECURITY OF INFORMATION

We are pleased to have you as a client of StraightLine Group, LLC (“StraightLine,” “we,” or “our”). StraightLine is your personal investment advisor for your accounts in your employer sponsored retirement plan or that we manage for you at Charles Schwab & Co., Inc. We understand that your privacy is very important to you, and we will use our best efforts to respect and protect your privacy. We will maintain client information according to strict security and confidentiality standards. However, in order to gain the maximum benefit from our services, you will need to disclose to us certain personal and private financial information.

The following provides you with information about our privacy policies and practices and our security precautions, which are designed to protect your privacy. It includes information about:

### OVERVIEW

1. The nonpublic personal information that is collected from you, which may be through our web site, from your retirement plan sponsor, provider, or record keeper, or through personal meetings with our representatives, all in connection with the services we provide to you;
2. How we use the information that we collect;
3. Our policies regarding the sharing of your personally identifiable plan information with third parties (people or companies who are wholly unaffiliated with StraightLine);
4. The security procedures that are in place to protect the loss, misuse or alteration of information under our control; and
5. How we will notify you of any changes to our privacy policies and practices.

### STRAIGHTLINE’S PRIVACY AND SECURITY OF INFORMATION STATEMENT

#### 1. **Information Collected:**

We collect nonpublic personal information from you, our client, to assist us in giving you appropriate investment advice and in managing your investments. We have used our best efforts to determine the type of information needed to best serve you and to limit our collection of your information to only the information needed to provide our services to you. We will not sell, share, or rent this information to any third party in any way other than what is disclosed in this statement. We collect information from you from the following sources: our web site, applications and other forms that you complete, your retirement plan sponsor or record keeper, and meetings with your representatives of StraightLine. Much of this information we collect is “nonpublic personal information” or “personally identifiable information,” about you for which you have a reasonable expectation of privacy. It is information that you would most likely not want shared with others. The information we collect may include:

- Your name, date of birth, address, telephone number, email address and social security number;
- Your income or salary, including your anticipated salary at retirement;
- Your spouse’s salary, including his or her anticipated salary at retirement;
- The identity of your employer, and your plans with respect to how long you intend to keep working;
- Your other assets, for example other retirement or regular investment accounts;
- Your other retirement savings plans or pensions, including information about retirement plans not included in our services rendered to you;
- Your spouse’s other assets which they have accumulated;

- Your spouse’s other retirement savings plans or pensions, including information about retirement plans not included in our services rendered to you;
- Your saving habits, and existing level of insurance coverage;
- Your opinion as to your life expectancy; and
- Your retirement goals.

This information is important to us because it helps us determine your “risk tolerance” and allows us to give you customized investment advice for your account.

**a. Cookies**

Our web site does not collect personally identifiable information about you except when you specifically and knowingly provide it. We leverage a technology called “cookies,” which can be used to provide customized information from our Web site. A cookie is an element of data that a Web site can send to your browser, which may then store it on your system for future use. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it.

**b. Log Files**

Our web site logs Internet Protocol (IP) addresses for systems administration purposes. IP addresses are logged to track a user’s session. This gives StraightLine an idea of which parts of our site users are visiting. We do not link IP addresses to any personally identifiable information. This means that a user’s session will be tracked, but the user will be anonymous.

**2. How we use your Nonpublic Personal Information:**

StraightLine uses your nonpublic personal information to provide our services to you. In addition to providing you with investment education, we provide customized investment advice to you for your employer’s retirement plan or other investment accounts.

Professional analysts at StraightLine conduct research in an effort to determine the objectives, strengths, and weaknesses of each investment option. The results of this research, when joined with your nonpublic personal information, allows us to give you specific advice as to how to allocate your account among the various investment options.

**3. Sharing of Nonpublic Personal Information**

We share your personally identifiable information with third parties only as part of normal business operations to the extent that the participation of the third party is necessary to provide our services to you. In the event we contract with a third party to help us provide our services to you, our agreement with the third party will expressly prohibit the third party from using your nonpublic personal information for any purpose other than assisting us in providing our services to you. We may use information such as your email address to send you ongoing communications that we feel are beneficial to you. If you do not wish to receive these ongoing communications, you may let us know by replying to a message and typing, “unsubscribe” in the subject line of your response, or you may email us at [info@straightline.com](mailto:info@straightline.com).

We also share information when required as part of normal legal and regulatory requests by the Internal Revenue Service, Securities and Exchange Commission, and other regulatory and government entities.

**4. Security Procedures**

*Information Transmitted via our Web Site*

StraightLine also takes precautions to protect your nonpublic personal information transmitted to us via our web site. When you submit nonpublic personal information to us via our web site, your information is protected both online and off-line. We protect your account information by placing it on the secure portion of our web site. That's why you have to enter a unique User Name and Password each time you want to access your information. Your Password should never be shared with anyone. When you are asked to enter nonpublic personal information (such as your social security number) that information is encrypted and is protected with the Secure Sockets Layer (SSL) protocol, the leading encryption technology. While you are on a secure page the "lock" icon on your web browser page becomes "locked," which indicates that the site is using a secure protocol, as opposed to appearing unlocked, or open as it normally appears when you are accessing the non-secure sites.

SSL works like this: information that you enter (such as your Social Security number) becomes a string of unrecognizable numbers before entering the Internet. When your encrypted data reaches StraightLine, our server decodes the information and stores it in our database. Both StraightLine's server and the browser you use to navigate the Web understand the mathematical formulas used to turn your personal data into numeric code and then back again. Every time you enter information and every time the information is accessed from our database, it is encrypted. Each time you log-on to the StraightLine site, our server and your Web browser agree on a random number (your session ID), which serves as the "decoding key" while you are logged into the site. The random number used depends on the level of encryption your browser supports.

StraightLine will encrypt your information in 128-bit encryption. This means that there are literally billions upon billions of possible key codes for each encrypted session. This level of encryption is also known as "domestic-grade encryption" and is the same that is used for paying bills or transferring money via your bank's on-line banking service. Another common type of encryption is 41-bit or "international grade" encryption. This level of encryption is approved for export to countries other than Canada.

#### *Information Retained in our Offices*

In addition to using SSL encryption to protect sensitive information online, we take other steps to protect personally identifiable information in hardcopy or on our servers. All of your information, not just the sensitive nonpublic personal information mentioned above, is restricted in our offices. Only employees who need the information to perform a specific job (for example, our billing clerk or a customer service representative) are granted access to nonpublic personal information. Our employees must use password-protected screen-savers when they leave their desks. When they return, they must re-enter the password to re-gain access to your information. Furthermore, ALL employees are kept up-to-date on our security and privacy practices. Any time new policies are added our employees are notified and reminded about the importance we place on privacy and what they can do to ensure our clients' information is protected. Finally, the computer servers storing your nonpublic personal information are kept in a secure, locked room.

#### **5. Notification of Changes to This Policy**

If we change our privacy policy, we will notify you of those changes and we will post those changes on our Homepage so you will be aware of how those changes may affect you.

Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. While we strive to protect your personal information, StraightLine cannot ensure or warrant the security of any information you transmit to us from our online services. Once we receive your nonpublic personal information, we will make our best effort to ensure its security on our systems.

We thank you for taking the time to read this statement.

For more information call us at 1-866-401k-advice or 1-877-edu-403b to speak with a member of our team.