

## **GuidedChoice Privacy Policy**

**OVERVIEW** GuidedChoice (“we” or “us”) operates its websites, including our GuidedChoice and 3Nickels branded advice tools, i.e., the GuidedChoice Advisory Service and 3Nickels app, for the benefit of our customers and business partners (“customers,” “users” or “you”). This Privacy Policy describes our practices in connection with information that we collect when you visit any of our websites.

**GENERAL** GuidedChoice values your privacy. As a GuidedChoice user, be assured that your privacy is protected. Information obtained directly from our users, your plan sponsor, and/or plan record keeper is used only for the stated purpose. Information that GuidedChoice collects and maintains will not be released to any party outside of GuidedChoice except as otherwise disclosed in this Policy.

**TECHNOLOGY** We help protect against unauthorized access and alteration to customer data through the use of malware detection and prevention, firewalls, and other industry-standard technologies. GuidedChoice encrypts sensitive information transmitted online and uses advanced technologies for information backup and recovery.

We use automated tools and algorithms to assist in analyzing your financial information and providing investment recommendations. These systems process your personal and financial data to help us deliver tailored advice and manage your portfolio efficiently. While our investment professionals review and oversee the recommendations, certain aspects of our services may involve automated processing. It is not possible to opt out of this process and continue to use our services.

**EMPLOYEE TRAINING** Only authorized personnel have access to confidential information. We require our employees to have information security training and implement these practices every day.

**OBTAINING AND HANDLING YOUR CONSENT** By using our websites or submitting personal information to us via your record keeper, plan sponsor, manual input, and/or electronic updates through account aggregation services, you agree that we may collect your personal information, and you consent to the use, disclosure, and transfer of your personal information in accordance with this Policy and as permitted or required by law. If you do not agree with this Policy, please do not use our websites, provide us with your personal information, or otherwise grant your consent.

You may refuse consent to our collection, use, and disclosure of your personal information, subject to legal and contractual requirements and reasonable notice. You may withdraw or revoke your consent to further collection, use, and disclosure of your personal information for certain of the purposes identified herein.

There are instances where we may collect, use, or disclose your personal information without your consent. For example, we may use or disclose your personal information to comply with a subpoena or court order or under applicable law.

**WHAT INFORMATION GUIDEDCHOICE COLLECTS** GuidedChoice may capture the following information about users of our services:

Categories of Personal Information	Specific Personal Information and Their Source	Retention Period
Identifiers	<p>Information collected directly from user, your plan sponsor, and/or plan record keeper:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Phone</li> <li>• Email address</li> <li>• Date of birth</li> <li>• Gender</li> <li>• Marital status</li> <li>• Tax filing status*</li> <li>• State where you file your tax return</li> <li>• Retirement age</li> <li>• Spouse's name</li> <li>• Spouse's gender</li> <li>• Spouse's retirement age</li> <li>• Dependent's name</li> <li>• Dependent's birth year</li> <li>• Eligibility for HSA*</li> <li>• Self-employment status*</li> </ul> <p><i>*3Nickels only</i></p>	<p>In cases where investment advice has been provided, by law we must keep record of that advice and who it was for, as well as the information used to determine it. Any other data collected will either be deleted or obfuscated so that it cannot be associated with a particular user.</p>
Financial information (as described in CA Code §1798.80)	<p>Information collected directly from user, your plan sponsor, plan record keeper, and/or account aggregation:</p> <ul style="list-style-type: none"> <li>• Your annual salary</li> <li>• Spouse's annual salary</li> <li>• Other financial information, e.g., investment balances, pension information, contributions to retirement plans</li> </ul>	

Professional or employment-related information	Information collected directly from user, your plan sponsor, and/or plan record keeper: <ul style="list-style-type: none"> <li>• Company name</li> <li>• Company information</li> </ul>	
Internet/electronic activity	User status via website cookies when logged in to GuidedChoice-branded or 3Nickels-branded account	
Device data	Via browser or device information, we collect computer or mobile device operating system type and version number, manufacturer and model, browser type, screen resolution, IP address, the website you visited before browsing to our website, and general location information such as city, state, or geographic area	
Website usage	Via analytics tools we track pages viewed, time spent on a page, navigation paths between pages, info about the activity on a page and/or access times and duration of access	

**HOW GUIDEDCHOICE USES THE INFORMATION IT COLLECTS** This Privacy Policy describes how GuidedChoice treats information we receive from you when you use our websites and mobile apps.

**HOW DO WE USE YOUR INFORMATION?** We may use the information we collect from you for a variety of reasons related to our business operations and as set forth in this Policy. Examples of ways that we may use such information include the following:

- Providing financial advice and guidance,
- Responding to your requests,
- Communicating with you,
- Contacting you at a telephone number you have given us to in order to respond to a service request,
- Tracking our visitors' use of our websites,
- Improving the content, appearance, and utility of our websites,
- Compliance, audits, and providing assistance to law enforcement, and
- Completing a corporate transaction, such as a merger, sale, joint venture, or disposition of all or any portion of our business, assets, or stock.

**HOW DO WE SHARE YOUR INFORMATION?** GuidedChoice is committed to protecting the personal information that our customers provide to us. The data you send to or enter into a GuidedChoice or 3Nickels website is considered your confidential and proprietary information. It is our policy to respect the privacy of our customers, and for this reason we do not sell, reveal, or share any of your personal information with any third parties, including your own employer. We will not monitor, edit, or disclose the contents of your data except to our service providers for our business purposes or if required to do so by law or in the good faith belief that such action is necessary to:

- 1) Conform to the law or comply with legal process served on GuidedChoice,
- 2) Protect and defend the rights or property of GuidedChoice, or
- 3) Act under exigent circumstances to protect the personal safety of our customers or the public.

**DO WE MONITOR WHO USES OUR WEBSITE?** Each time a user visits our website, our server collects certain use and navigation information. This information is aggregated and analyzed to tell us when and how the website is used and navigated, including the number, frequency, and duration of visits to each web page. It also helps to inform us of any performance-related issues we have so that we can correct them to provide you with a more efficient website.

**WHAT ARE "COOKIES" AND HOW DO WE USE THEM?** Cookies are small files that are stored by your browser on your computer's hard drive while accessing the Internet. Server programs that provide information back to the website then read these files. Most companies like ours make use of browser cookies. Once you become a user of our website, we may use cookies occasionally to store some information on your computer, which we use only for the purpose of authentication and session maintenance. Our cookies do not contain any personal information about you; they enable us to provide you system access of the web pages. The cookies will not enable third parties to access any of the information stored on your computer. Most web browsers are set to accept cookies automatically, but usually you can either change the browser preferences to warn when a cookie is about to be written, or to not accept them at all. Parts of our website will function without cookies, but cookies will be required to use our web-based and mobile advice tools and services.

**RETENTION OF YOUR PERSONAL INFORMATION** The personal information that you provide will be retained by us for a period necessary for the purpose in question or in accordance with applicable laws.

**SECURITY** We seek to use reasonable organizational, technical, and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, for example, if you

feel that the security of your account has been compromised, please notify us immediately in accordance with the "Contact Us" section below.

**CHOICE AND OPT-OUT** Subject to reasonable notice, you may withdraw your consent to certain of the purposes identified herein at any time, unless the personal information is necessary for us to fulfill our legal requirements or similar obligations. To withdraw your consent, please contact us at the address below and advise us of what personal information you no longer wish us to use.

If you withdraw or revoke your consent, you acknowledge that we may not be able to provide you or continue to provide you with certain services or information which may be of value to you. In the event of changes or opt-out requests, we may retain your personal information for reasonable purposes, for example, in connection with your past transactions.

Please note, to identify you, we may need to ask you for additional information in order to be able to fulfill your opt-out request, and that applicable laws may contain restrictions and other provisions that relate to your rights above.

**CALIFORNIA PRIVACY RIGHTS AND CHOICES** The California Consumer Privacy Act of 2018 (the "CCPA") and the California Privacy Rights Act 2023 (the "CPRA") provides California residents with specific rights regarding the collection and storage of their personal information. This section describes how these rights apply to you if you are a California resident.

**ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY RIGHTS** You have the right to request that GuidedChoice disclose the following information to you about our collection and use of your personal information over the past twelve (12) months. Once we have received a request from you, we may ask you to provide certain information to identify you and verify your request. Upon verification, we will disclose to you:

- 1) The categories of personal information we collected about you.
- 2) The categories of sources for the personal information we collected about you (e.g., use of cookies, third party, etc.).
- 3) The specific pieces of personal information we collected about you.
- 4) Our business or commercial purpose for collecting that personal information.
- 5) We do not sell personal information; however, if we disclose your information to a third party, we will provide to you the categories of third parties with whom we share personal information and the categories of information that we share with each third-party recipient.

**DELETION REQUEST RIGHTS** You have the right to request that GuidedChoice delete or correct any of the personal information collected from you and retained by us, subject to certain exceptions. Once your request is verified and we have determined that we are

required to delete that data in accordance with applicable law, we will delete and direct our service providers to delete your personal information from our records. Your request to delete personal information collected may be denied if it is necessary for us to retain your information under one or more of the exceptions listed in the CCPA/CPRA.

**CORRECTION REQUEST RIGHTS** You also have the right to ask that GuidedChoice correct the personal information it has about you, subject to certain exceptions. See Exercising Your Rights below.

**RIGHT TO OPT-OUT OF THE SALE OR SHARING OF YOUR PERSONAL INFORMATION**

You have the right to opt-out of the sale or sharing of your personal information. GuidedChoice, however, does not sell your data and only shares data with our service providers for our business purposes or if required to do so by law or in the good faith belief that such action is necessary. Please see the “How do we share your information?” section above.

**EXERCISING YOUR RIGHTS** To exercise any of the rights described above, please submit a verifiable consumer request to us by:

- Calling us at 888-675-4532
- Selecting the Delete Account button under Account Settings in the 3Nickels app
- Sending an email to [help@guidedchoice.com](mailto:help@guidedchoice.com) or [help@3nickels.com](mailto:help@3nickels.com)

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. You may make a verifiable consumer request for access only twice within a 12-month period. Your verifiable consumer request must:

- Provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information, or a person authorized to act on your behalf; and
- Describe your request with sufficient detail to properly understand and respond to it.

We will use the personal information that you have provided in a verifiable consumer request in order to verify your request only. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority.

Making a verifiable consumer request does not require you to create an account with us.

**RESPONSE TIMING AND FORMAT** We will acknowledge your request within ten (10) days and will process it within forty-five (45) days of receipt. If we are unable to deliver a response to verifiable consumer requests within this timeframe, we will inform you of

the reason and estimated extension period in writing. We will deliver a written response by mail or electronically, at your option.

Any disclosures will cover only the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. Data portability requests will be issued in a format that is readily useable. We do not charge a fee unless your request is excessive, repetitive, or manifestly unfounded. If the request warrants a reasonable fee, we will tell you why and provide you with a cost estimate before completing your request.

## **REGULATION S-P DISCLOSURE**

**INFORMATION WE COLLECT (REG S-P DISLCOSURE)** In addition to the details above, we confirm that we collect nonpublic information ("NPI") about you to provide services and comply with legal obligations. This includes identifiers, financial information, and data from plan sponsors, custodians, and service providers.

**HOW WE SHARE INFORMATION (REG S-P DISCLOSURE)** We do not sell your information. We share only:

- With service providers performing functions for us under strict confidentiality and security requirements
- For processing transactions and legal/regulatory obligations
- As permitted by law (e.g., fraud prevention, subpoenas)

**YOUR RIGHTS UNDER FEDERAL PRIVACY LAW** Because we do not share NPI with nonaffiliated third parties for marketing, no opt-out is required. If that changes, we will provide an opt-out notice before sharing.

**SAFEGUARDS AND INCIDENT RESPONSE** We maintain written policies and procedures to protect customer information including:

- Administrative, technical, and physical safeguards
- Vendor oversight and contractual security requirements
- An incident response program: If sensitive customer information is accessed without authorization, we will notify you within 30 days unless a documented investigation shows no risk of harm

**RECORD RETENTION AND SECURE DISPOSAL** We retain records as required by law and securely dispose of customer information when no longer needed.

**ANNUAL NOTICE COMMITMENT** We review our Privacy Policy on an annual basis. It is available on our websites, within our digital applications both when logging in and on the Profile page (Advisory Service) or in Settings menu (3Nickels).

**ACCOUNT DELETION RIGHTS APPLIES TO ALL USERS** Regardless of US state residency, all users can request deletion of their account. The easiest method for 3Nickels' users is to use the app to log into your 3Nickels account and under Account Settings, select the Delete Account button. GuidedChoice Advisory Service user accounts can be deleted by email or phone request only if (1) you have not received advice from the service or (2) we did not receive the data about you and your employer retirement plan from your employer or plan record keeper. By law, we must maintain records of advice recipients as described above; in addition, we cannot remove accounts that are part of an employer plan, as we are not the source of authority. We will acknowledge your request via the email associated with your account within ten (10) days of receipt and process your request within forty-five (45) days. You are also welcome to contact customer service at 888-675-4532, [help@3nickels.com](mailto:help@3nickels.com), or if using a GuidedChoice-branded service, [help@guidedchoice.com](mailto:help@guidedchoice.com).

**CONTACT US** From time to time we may make changes to our Privacy Policy. As we do, we will make them available on our website, so be sure to check for any changes.

**WHAT IF I HAVE QUESTIONS OR COMMENTS?** If you have any questions or comments regarding our Privacy Policy, feel free to contact us at 888-675-4532 or [help@guidedchoice.com](mailto:help@guidedchoice.com).

If you wish to access or change any of the information collected by GuidedChoice, you may do so by sending an email to [help@guidedchoice.com](mailto:help@guidedchoice.com) or [help@3nickels.com](mailto:help@3nickels.com). When contacting us, please be sure to provide us with your exact e-mail address, name, address and/or telephone number(s) so that we may handle your request appropriately. In some circumstances, we may not provide access to your personal information if, for example, it contains the personal information of other people, if it constitutes confidential commercial information, or if it is otherwise not the subject of an access request.

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