

## PRIVACY POLICY

Last Updated: August 29,2024

This Privacy Policy describes the types of Personal Information that Prime Pensions, Inc.; Associated Pension Consultants, LLC; Pension Benefits Unlimited, Inc.; Prime Pensions Northwest, LLC; Prime Retirement Solutions, LLC; Northwest Retirement Plan Consultants, LLC (collectively, “**Company**,” “**we**,” “**our**,” or “**us**”) collects from and about you, how we use and disclose Personal Information, and choices and rights you may exercise over Personal Information. We ask that you carefully review this Privacy Policy, as it applies to any website (a “**Site**”) or mobile application (an “**App**”) of the Company that displays or links to this Privacy Policy (collectively, our “**Services**”).

For purposes of this Privacy Policy, “Personal Information” refers to information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you, and includes “personal data” or similar terms as defined under applicable law.

This Privacy Policy does not apply to the consulting, tax preparation, and other services that the Company provides to its customers (the “**Professional Services**”). We process any Personal Information that we receive from customers solely on their behalf to provide the services that they obtain from us.

### 1. NOTICE AT COLLECTION OF PERSONAL INFORMATION

We collect the categories of Personal Information identified below. We do not “sell” or “share” Personal Information, nor do we use Personal Information for the purposes of “targeted advertising” as those terms are defined under applicable law.

#### A. Categories of Personal Information Collected

- **Identifiers/biographical information**, including name, email address, phone number, and online identifiers such as your, Internet Protocol (“IP”) address.
- **Internet or other electronic network activity information**.
- **Geolocation data**, specifically your rough geographic location based on your IP address.
- **Professional or employment-related information**, such as your job title and company affiliation.

## **B. Purposes of Personal Information Use**

We use Personal Information for the following commercial and business purposes:

- To provide and communicate with you about our Services
- To review the usage and maintain the operation of our Services
- To monitor, protect, and maintain the security and integrity of our Services and our business
- To comply with applicable laws and regulations and respond to lawful requests and communications from law enforcement and other government agencies
- To carry out sales and business transactions in which information held by us is among the assets transferred or is otherwise relevant to the evaluation, negotiation, or completion of the transaction
- To protect our rights, privacy, safety, property and/or those of others
- To fulfill any other purpose for which you provide your Personal Information or as explained to you at the point of information collection

## **C. Retention**

We will retain your Personal Information for as long as reasonably necessary to provide you with our Services, or otherwise where permitted or required in accordance with applicable law. We will retain and use your Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. What this means in practice will vary among different types of information, and when we consider our approach we take into account ongoing business or legal needs for the information.

## **2. PERSONAL INFORMATION WE COLLECT**

We obtain Personal Information about you in the following ways:

- **Information You Provide:** We collect Personal Information directly from you when inquire about our Professional Services.
- **Automatically Collected Information:** We and our service providers automatically collect certain information regarding your activity when you visit and interact with our Services. This includes your device's IP address and/or other unique identifiers, browser type, device type; approximate location derived from your IP address; information about the pages you visit. We and our vendors collect some or all of this information through cookies (text files that are stored on your device) and similar technologies.

### 3. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We may disclose any of the categories of Personal Information that we collect to these categories of recipients:

- **Our Service Providers.** We disclose your Personal Information to our service providers that provide business, professional, marketing, analytics, or technical support services to us, help us operate our business and the Services. We require our service providers to only use your Personal Information in connection with providing services to the Company.
- **Our Analytics Partners.** We disclose your Personal Information to our partners that assist us in performing analytics and help us measure the effectiveness of our Services' content and our marketing and advertising efforts.
- **Competent Governmental, Regulatory, and Public Authorities.** We may disclose your Personal Information to government and law enforcement authorities, in each case to comply with legal or regulatory obligations or requests.
- **Relevant Third Parties as Part of a Corporate Transaction.** In the event of a 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 a bankruptcy or similar proceeding), we may disclose or transfer your Personal Information to certain third parties, such as the acquiring entity and its advisers.
- **Other Third Parties.** We will disclose your Personal Information to other third parties at your direction or with your consent. Additionally, we will disclose your Personal Information as we believe necessary or appropriate to: (a) comply with applicable law; (b) enforce our terms and conditions; (c) protect our operations; (d) protect our rights, privacy, safety, or property, and/or those of you or others; and (e) allow us to pursue available remedies or limit damages that we may sustain.

We may disclose your Personal Information for other reasons that we will describe at the time of information collection or prior to disclosing your information.

Please note that we may de-identify or aggregate Personal Information so that it is no longer Personal Information. Our use of de-identified or aggregated information is not governed by this Privacy Policy.

### 4. YOUR PRIVACY CHOICES AND RIGHTS

You may make certain choices about how we use your Personal Information, as follows:

#### A. Unsubscribing from our Marketing and Promotional Communications

From time to time, we may send you marketing and promotional communications. If you no longer wish to receive promotional and marketing emails from us, you may opt out at any time.

## B. Privacy Rights and Requests

Depending on your U.S. state of residence, you may have certain rights in relation to your Personal Information, including:

- **Right to Know:** You may have the right to know what Personal Information we have collected about you, including the categories of sources, the business or commercial purpose of collection, and the specific pieces of Personal Information we have collected about you.
- **Right to Data Portability:** You may have the right to access your Personal Information in a portable format.
- **Right to Delete:** You may have the right to request that we delete Personal Information that we have collected from you, subject to certain exceptions.
- **Right to Correct:** You may have the right to correct inaccurate Personal Information that we may maintain about you, subject to appropriate verification.

Where permitted under applicable law, we may decline a request if we are unable to verify your identity (or an agent's authority to make the request).

If you are interested in exercising one or more of the rights outlined above, please click [here](#) or you can contact us at [infosec@primepensionsinc.com](mailto:infosec@primepensionsinc.com) or (973) 845-7654. Please put the statement "Your Privacy Rights" in the subject field of your email. We may take steps to verify your identity before responding to your request by asking you a series of questions about your previous interactions with us. Submitting a privacy rights request does not require you to create an account with us.

We will not discriminate against you if you decide to exercise your privacy rights.

## C. Agent Requests

Depending on your U.S. state of residence, you may authorize someone to make a privacy rights request on your behalf (an authorized agent). Authorized agents will need to demonstrate that you've authorized them to act on your behalf. Company retains the right to request confirmation directly from you confirming that the agent is authorized to make such a request, or to request additional information to confirm the agent's identity.

## D. Right to Appeal

Depending on your U.S. state of residence, you may have the right to appeal a decision we have made in connection with your privacy rights request. To appeal a decision, please contact us at [infosec@primepensionsinc.com](mailto:infosec@primepensionsinc.com) or (973) 845-7654.

## **5. EXTERNAL LINKS**

Our Services may have links to third-party services, which may have privacy policies that differ from our own. We are not responsible for the practices of such sites.

## **6. DATA SECURITY**

We have implemented physical, administrative, and technical safeguards to maintain the security, confidentiality, and integrity of your information. However, as no transmission of information over the internet is absolutely secure, we cannot guarantee the safety of your information.

## **7. REVISIONS TO THIS PRIVACY POLICY**

We reserve the right, in our sole discretion, to change, modify, add, remove, or otherwise revise portions of this Privacy Policy at any time. When we do, we will post the change(s) to our Services. Your continued use of our Services following the posting of changes to these terms means you accept these changes. If we change the Privacy Policy in a material way, we will provide appropriate notice to you.

## **8. HOW TO CONTACT US**

If you have any questions or concerns about this Privacy Policy or the practices described herein, you may contact us at [infosec@primepensionsinc.com](mailto:infosec@primepensionsinc.com) or by mail to Prime Pensions, Inc at 25 Vreeland Rd, Florham Park, NJ 07932.