

## **PRIVACY POLICY**

This Privacy Policy sets out how the Trustees of the SMART Local 265 Welfare Fund (Welfare Fund), the Trustees of the SMART Local 265 Pension Fund (Pension Fund), and the Trustees of the SMART Local 265 Supplemental Retirement Savings Fund (collectively, the Fringe Benefit Funds) use and protect any information that Participants provide the Fringe Benefit Funds.

The Fringe Benefit Funds are devoted to ensuring that our Participants' privacy is protected. Should the Fringe Benefit Funds ask you to provide certain information by which you can be identified when accessing your account, you can be assured that such information will only be used in accordance with this Privacy Policy.

The Fringe Benefit Funds have a policy of protecting the confidentiality and security of information that the Fringe Benefit Funds collect from Participants. The Fringe Benefit Funds do not share Participants' non-public personal information with unaffiliated third parties. Information is only shared with Participants' consent, except for the specific purposes below, in accordance with all applicable laws. Please read this Privacy Policy carefully. It gives you important information about how the Fringe Benefit Funds handle your personal information.

The Fringe Benefit Funds reserve the right to change this Privacy Policy at any time.

## **USE OF INFORMATION**

The Fringe Benefit Funds limit the collection and use of non-public personal information to the minimum the Fringe Benefit Funds believe is necessary to administer benefits for its Participants. Services can include advising the Participants about coverage and claims information, maintaining Participants' accounts, and providing Participants with notices.

## **WHAT THE FRINGE BENEFIT FUNDS COLLECT**

The Fringe Benefit Funds obtain most non-public personal information directly from Participants whether in person, by telephone or electronically. The Fringe Benefit Funds may obtain the following information:

- First name, last name;
- Contact information, including home address, email address, telephone numbers;
- Social security numbers; and
- Unique employee identification numbers (UID Numbers).

## **DISCLOSURE**

The Fringe Benefit Funds do not disclose non-public personal information about their Participants to anyone, except when the Fringe Benefit Funds believe it is necessary for the proper administration of the Fringe Benefit Funds, or where disclosure is required by law. Except in those specific limited situations, without your consent, the Fringe Benefit Funds will not make any disclosures of non-public personal information to unaffiliated third parties.

### **WHAT THE FRINGE BENEFIT FUNDS DO WITH THE INFORMATION THAT IS GATHERED?**

The Fringe Benefit Funds require information to provide you with better service for the following reasons:

- Internal record keeping;
- Processing of Plan benefits;
- Sending information to Participants about important changes in the Plan(s); and
- Providing certain information, including social security numbers and addresses to the Internal Revenue Service, and state and local taxing authorities.

## **SECURITY**

The Fringe Benefit Funds are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure of information, the Fringe Benefit Funds have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information the Fringe Benefit Funds collect. To ensure that all Participants' information is secure, the Fringe Benefit Funds work with a technology-based company, ISSI (Innovative Software Solutions, Inc.), a leading provider of Benefit Administration computer systems

The security of your personal information is important to the Fringe Benefit Funds, but remember that no method of transmission over the internet, or method of electronic storage, is 100% secure. While we strive to use commercially-acceptable means to protect your personal information, we cannot guarantee its absolute security.

## **COOKIES**

A "cookie" is a small summary text file that is stored by your mobile phone (e.g., phone or Android) or by your browser (e.g., Internet Explorer, Edge, Chrome, Safari or Firefox). Cookies allow a website to store some information about users, allowing the website to recognize a user and respond appropriately.

- The website may use cookies to collect anonymous usage statistics to track site utilization. Identifiable visitor usage information may also be stored in internal log files. We use this information to troubleshoot issues, improve our online services, and for analytical purposes, such as analyzing trends, administering the site, tracking user movements and gathering broad demographic information; and
- The website utilizes cookies to ensure basic functionality for authenticating users, including, but not limited to, initiating and terminating valid sessions.

### **CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy is effective as of January 1, 2020 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this Website.

We reserve the right to update or change our Privacy Policy at any time and you should review this Privacy Policy periodically. Your continued use of this Website after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you provided us, or by placing a prominent notice on the Fringe Benefit Funds' Website.

### **CONTACT US**

If you have any questions about this Privacy Policy, please contact us at SMART Local 265 Fringe Benefit Funds, 205 Alexandra Way, Carol Stream, IL 60188; phone (630) 668-7260.