## **Privacy Policy**

This Privacy Policy describes how the Rochester Laborers' Funds Office treats the personal information we collect through this website (Portal) and what we do with that information. By using or accessing the Portal, you are accepting the practices described in this Privacy Policy. This Privacy Statement applies only to information collected online through the Portal and does not describe the ways in which we may collect or use information obtained offline or through any other means. We may amend this Privacy Policy at any time.

### How we collect data

The Rochester Laborers' Funds Office collects personal information as required or permitted by law.

Based on the services or benefits you receive that we administer, your personal data may be collected from the following sources:

- From you when you communicate with us by email, by web, by correspondence, or by phone.
- Information you provide on the Portal (such as information about your dependents or retirement goals).
- From you, or your representative, when you complete applications and forms for various services or benefits.
- From service providers such as payroll providers, insurance carriers or third-party administrators.
- From activity in your account.
- From your device when you browse websites or mobile applications (see cookies and web beacons sections below).

#### How we use data

The Rochester Laborers' Funds Office uses your personal data to respond to your requests and inquiries and to provide you with services and benefits we administer. In the event you receive services pursuant to a services agreement between the Plan Sponsor and a third-party, the Rochester Laborers Funds Office will process your data to perform the services in accordance with that agreement.

The Rochester Laborers' Funds Office will use your data for other purposes as permitted by law, including to meet the requirements of applicable laws and regulations.

The Rochester Laborers' Welfare and Supplemental Benefits Fund maintains a HIPAA privacy policy that specifically addresses how the Fund maintains and protects your Protected Health Information. That Policy is available at the Rochester Laborers' Funds Office.

#### How we share data

We limit the information we share and the parties we share it with. We do not sell your personal data. We do not share your personal data in any way that requires that we offer you an "opt-out" of such sharing.

Personal data may be shared as necessary to effect, administer, or enforce a transaction you request or authorize, with your consent, at your direction, or as allowed by applicable law.

# For example:

- Retirement & Health plans If you are enrolled in a retirement or health plan offered by the plan sponsor, your personal data may be shared with the plan sponsor's third-party administrators, advisors, and service providers as authorized or directed by the plan sponsor.
- Health Information Your health information will not be shared except as permitted or required by law. The Rochester Laborers' Welfare and Supplemental Benefits Fund maintains a HIPAA privacy policy that specifically addresses how the Fund maintains and protects your Protected Health Information. That Policy is available at the Rochester Laborers' Funds Office.

Other disclosures of your data may include:

- To protect against or prevent actual or potential fraud, unauthorized transactions, claims or other liability.
- To persons acting in a fiduciary or representative capacity on your behalf.
- To provide information to persons assessing our compliance with industry standards, and our attorneys, accountants and auditors.
- To comply with federal, state, or local laws, rules, and other applicable legal requirements.
- To comply with a properly authorized civil, criminal or regulatory investigation or subpoena or summons by federal, state or local authorities, or to respond to judicial process or government regulatory authorities having jurisdiction over the financial institution for examination, compliance or other purposes as authorized by law.
- To report claims experience or for an audit.
- For purposes otherwise permitted or required by law.

After your relationship with us ends, the terms of this policy shall continue to be applicable to your data as long as we retain your data.

### **Security**

We use physical, administrative and technical safeguards designed to protect the confidentiality, integrity and availability of your personal information. Any third-party service providers with whom we share your personal information agree to maintain the confidentiality and security of the personal data and use it solely to provide their services to us or you.

### Portal use

When you access the Portal, we or our third-party suppliers use a variety of technologies, such as cookies that automatically collect data (such as: without limitation, your device type, browser type, internet protocol address, operating system used, number of visits, average time spent on the site and pages viewed). This data is used to operate the Portal more efficiently, maintain the security of your online session, and improve our Portal's design and navigation. We use this information internally to provide you with a better user experience.

Some of our Portals include links or navigation to third-party sites. These third-party sites may include informational sites, sites providing financial wellness tools and services, or services offered to you solely by a third party, as further described in the disclosures provided on such sites.

## **Cookies**

A "cookie" is a small summary text file that is stored by your mobile phone (e.g., iPhone 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 Portal 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.
- The Portal utilizes cookies to ensure basic functionality for authenticated users, including but not limited to initiating and terminating valid sessions.

If you do not want to have cookies on your computer or device, you can use the settings or tools offered on your browser to refuse or deny cookies, or to delete cookies that have already been stored. If you refuse or delete cookies, you may notice an impact on your use of the Portal; for example, you may not be able to sign in and access your account without additional authentication,

# Requests, questions or complaints

We encourage you to visit the "General Information" tabs on the Portal, which will include helpful tips about how to keep your online account secure.

You may send us requests, questions or complaints as described at the top of this privacy policy. In addition, you may contact us by mail to the address below:

Rochester Laborers' Funds Office

Attn: Melissa Del Prete, Funds Administrator