

## **PRIVACY POLICY**

This Privacy Policy (“Policy”) describes how the Carpenters’ Combined Funds (“CCF”) transmits, uses, shares and protects business, financial, and personal information. This Policy applies to all information provided, transmitted, or submitted to CCF in connection with the services provided to or on behalf of our Users. (“Services”).

Data privacy, and the privacy of the information provided, is important to us. We use reasonable care to protect data provided to us by or on behalf of employers and members visiting our Site (collectively “Users”) from loss, misuse, unauthorized access, disclosure, alteration and untimely destruction. This Policy governs personal information collected, processed, or disclosed by CCF for its own purposes as well as information provided to us as a service provider for Users. It protects information collected online as well as offline. We may receive personal data from employers about members, as well as members’ dependents and/or family members as needed to provide Services. CCF will collect and process your personal information as instructed or permitted by our Users or in accordance with this Policy.

We do not grant access to personal information except as set forth herein. We do not share or sell personal information provided or transmitted to our Site with any third parties for their own marketing purposes.

### **What Information is Collected**

We limit the information that we collect, to the information that we need to provide our Services, to administer and improve the Site or our Services, and to fulfill any legal and regulatory requirements.

The categories of personal information that we may collect include the following:

- Contact information to allow us to communicate with you or to provide the Services
- Social security number, date of birth, name, address, email address, phone number, including mobile phone number, and other details as needed to provide the Services
- Other personal information as needed to provide specific Services
- Other information and documentation provided as part of CCF’s customizable fields or Services, to be stored within the Site and Services, which may include other personal information, personal health information, and/or other human resource information CCF seeks to collect and retain through the Site.

### **How Personal Information is Collected or Transmitted**

To access or use certain information, features, or Services, you may be required to provide personal information. Personal information is primarily collected, submitted, and/or transmitted:

- When a User provides it to CCF to facilitate the processing of the Services
- From you when you utilize the Site or Services

- If you provide us with comments or suggestions, request information about our Services, or contact our customer service or support departments via phone, email, chat or other forms of communication

### **How Personal Information is Used**

We may use personal information to:

- Administer and improve our Site
- Facilitate employer submissions of benefit reports
- Detect fraud or theft or for other security purposes
- Comply with legal, reporting, and regulatory requirements
- Maintain, manage, or service accounts
- Provide customer service or support
- Verify User identity
- Research and develop technological improvements
- Send transactional communications as part of our Services
- Improve, upgrade, or enhance our Services
- Administer quality and safety maintenance for our Site or Services
- For other purposes that are compatible with this Privacy Policy or where permitted by applicable law
- In any other way we may describe when you provide the information, or for which you provide authorization

### **Parties with Whom Information May Be Shared**

Information is shared to facilitate the Services requested by or on behalf of members and employers or for our business operations. We may share information with:

- Our affiliates, partners, or subsidiary organizations
- Government agencies to fulfill legal, reporting and regulatory requirements
- Our employees, affiliated companies, subsidiaries, contractors, agents and third-party vendors to perform Services related to your account, to offer additional Services, perform analysis to determine qualification to receive future services, collect amounts due, or for our business operations
- Cloud providers, customer management platforms, security providers, and similar Services in connection with providing products, Services and in the support of daily operations
- Any other entity disclosed by CCF when Users provide the information, or for which Users provide authorization

## **Data Retention**

We retain personal information for as long as necessary to provide the Services and fulfill the transactions requested by or on behalf of Clients, or for other essential purposes such as complying with our legal obligations, maintaining business and financial records, resolving disputes, maintaining security, detecting and preventing fraud and abuse, enforcing our agreements, and for any other necessary business purpose.

## **How Cookies and Other Related Technologies are Used**

A “cookie” is a piece of data that our Site may provide to your browser while you are at our Site. The information stored in a cookie is used for user convenience purposes, such as reducing repetitive messages, tracking helper tool versions, and retaining user display preferences. If a user rejects the cookie, they will be able to browse the Site but will be unable to use our online application.

During your interaction, a Service may automatically collect information from your activity or device including:

- Computer, device, and connection information, such as browser type and version, operating system and other software installed on your device, mobile platform and unique device identifier and other technical identifiers, including IP addresses, error reports and performance data
- Usage data such as user preferences including features, settings, date and time stamps, and pages visited

## **Security**

CCF uses reasonable care to protect the confidentiality, integrity, and availability of your information and we continue to invest in our award-winning security capabilities, including personnel security and physical security; system security, access control, and monitoring; data backup and business continuity management; and vulnerability and intrusion detection. Specifically, we:

- Maintain policies and procedures covering physical and logical access to our workplaces, systems, and records
- Apply physical, electronic, and procedural safeguards aligned with industry-recognized best practices
- Use technology such as backups, virus detection and prevention, firewalls, and other computer hardware and software to protect against unauthorized access to or alteration of your information
- Encrypt sensitive information transmitted over the internet

- Through formal approval processes, access controls, and internal auditing, limit our employee's access to Client information to those who have a business reason to know
- Use advanced technologies for the backup and recovery of User information
- Monitor compliance with established policies through ongoing security risk assessments and internal audits

While we help protect the security and integrity of your information through procedures and technologies designed for this purpose, the safety and security of your information also depends on you. We may give you, or you may choose, account credentials to access certain parts of our Site or Services. It is solely your responsibility to maintain the security and confidentiality of your account credentials and the information and Services accessible through your account and the Site. If you suspect fraudulent or abusive activity relating to your account, or if your credentials have been lost, stolen or compromised in any way, you should immediately change your potentially compromised credentials and notify CCF.

### **Changes to This Privacy Policy**

This Policy may be revised from time to time due to legislative changes, changes in technology, our privacy practices, or new uses of your information not previously disclosed in this Policy. Revisions are effective upon posting and your continued use of this Site or our Services will indicate your acceptance of those changes. Please refer to this Policy regularly.