

## **Alight Solutions Privacy Statement**

This Privacy Statement describes how Alight Solutions ("Alight", "Us", or "We") collects, uses, and protects personal information it receives in the course of providing its services. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information. At Alight Solutions, your privacy is very important. We strive to protect the personal information under our control and to maintain the security and integrity of that information.

### **How Alight Solutions Receives Personal Information**

Generally, "personal information" is information that can be used to identify you. Most of the personal information we receive relates to your participation in the compensation and benefits programs offered by your employer. There are several ways that we could receive personal information:

- You might provide the information directly to us, such as by visiting our websites, telephoning our call center, filling out our forms and surveys, or by sending mail to our offices.
- Your employer or prospective employer ("employer") might provide the information to us. In such a case, we have no direct relationship with the individuals whose personal data we process. If you are an employee or prospective employee ("employee") of one of our Clients and would no longer like us to process your information, please contact your employer directly.
- Another service provider engaged by your employer (such as payroll processors, health plans, or mutual funds) that have a part in administering your employer's plans or programs might provide the information to us.

The types of personal information we receive may include:

- **Contact information**, such as name, address, phone number, email address, and company name
- **Other personal information**, such as a government-assigned identifier (for example, Social Security Number, Social Insurance Number), date of birth, gender, marital status, Internet Protocol (IP) addresses, income history and military history
- **Employment information**, such as date of hire, employment status, pay history, tax withholding information, leave information, and date of termination
- **Retirement Program participation information**, such as benefit elections, beneficiary information, benefit plan account numbers and balances, and date of retirement
- **Unique Identifiers**, such as user IDs, passwords, PINs, and employee IDs

We may use this information to:

- Assess the needs of your employer's business to determine suitable products.
- Send you communications in accordance with the services provided Alight Solutions to you on behalf of your employer.
- Respond to customer service inquiries.
- Administer your employer's account.
- Collect and compile research information in accordance with the services provided by Alight Solutions to your employer.
- Provide our services.
- Enable you to post your resume, search job postings, and contact or be contacted by prospective employers to the extent such activities are in accordance with our services.
- Implement third party services on behalf of your employer.
- Send you transactional communications.

### **Alight Solutions's Commitment to Protecting Personal Information**

We understand the responsibility that comes with being trusted with your personal information. We've implemented various security measures to protect the confidentiality of all the personal information we process, in both electronic and paper formats. We have policies, procedures, and controls to reduce the risk of unauthorized or accidental use, disclosure, or destruction of your

personal information, and we train our employees on data security. Only employees who have a job-related need to access your personal information are authorized to do so. In addition to these employees, Alight Solutions limits access to your personal information to your employer and authorized service providers. Additionally, when you enter sensitive information, we encrypt the transmission of that information using methods such as secure socket layer technology (SSL).

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Web site, you can contact us at [privacy.info@alight.com](mailto:privacy.info@alight.com).

Our commitment to protecting personally identifiable information also means that:

- We won't sell or lease your personal information to any third party.
- We will share your information with Alight partners, affiliates, and subsidiaries to the extent necessary to provide the provisioned services.
  - For instance, if we receive personal information for one of our partner's services, we will send the submitted data to our partner.
- We require that our service providers enter into confidentiality agreements intended to protect your personal information. These companies are authorized to use your personal information only as necessary to provide these services to us. For instance, where commissioned by your employer, we may provide your personal information to a service provider for purposes of printing and mailing your benefit statements to you.
- We won't use, transfer, or disclose your personal information to anyone other than described in this statement, unless authorized by you or your employer, except:
  - in connection with your employer's plans and programs,
  - as required by law, such as to comply with a subpoena, or similar legal process,
  - in response to law enforcement requests,
  - when we believe in good faith that disclosure is necessary to protect the property, interests, and rights of Alight Solutions or your employer,
  - if Alight is involved in a merger, acquisition, or sale of all or a portion of its assets, your information may be disclosed to the other company. You will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.
- If we process your personal information, we will comply with the applicable requirements of a relevant data protection law.
  - For instance, "protected health information" will be processed consistent with the requirements of the Health Insurance Portability and Accountability Act (HIPAA), and the personal information of Canadian citizens will be processed consistent with the requirements of the Personal Information Protection and Electronic Documents Act (PIPEDA).
- If your personal information is transmitted, used, stored, or otherwise processed outside of your country, Alight Solutions will ensure that your personal information will be protected consistent with the data protection laws applicable to your personal information at the time of collection. Such protection shall include, as required, the signing of data transfer agreements.

### Access and Corrections

Alight Solutions is committed to respecting your rights to access your personal information. In most cases, we rely on you and your employer to keep your personal information updated. You can access, correct, update, and request deletion of your personal information via our self-service websites, by telephoning our call center, by emailing [privacy.info@alight.com](mailto:privacy.info@alight.com), or by directing your query to your employer. We will respond to your request to access within 30 days.

In some circumstances, only your employer, and not Alight Solutions, may have the authority to update, correct, or delete your personal information. In these instances, please contact your employer directly. Otherwise, we will forward your request to your employer.

We will retain your information for as long as your account is active or as long as the data is reasonably useful for commercial purposes. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

### **Cookies and Other Technology**

Alight and our partners, affiliates, and service providers, such as our analytics service providers, use tracking technologies such as cookies, beacons, tags and scripts. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited. For more detailed information about cookies, review our [Cookie Notice](#) or go to [www.allaboutcookies.org](http://www.allaboutcookies.org) (a third-party website).

We use Local Storage Objects (LSOs) such as HTML5 to store content information and preferences. Third parties with whom we partner to provide certain features on our site or to display advertising based upon your Web browsing activity use LSOs such as HTML 5 to collect and store information. Various browsers may offer their own management tools for removing HTML5 LSOs.

**Website Log Files** – Alight Solutions may also log information related to your website visit or mobile site visit. We may link this automatically collected data to other information we collect about you.

This information can include:

- The address (or "URL") of the web pages you visit
- The browser you used to view our website
- Your Internet provider (IP) address
- The type of computer or device you used to view our website
- Statistics on page views

**Third Party Links** – Our Website includes links to other websites whose privacy practices may differ from those of Alight. If you submit personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any Web site you visit.

**Google Analytics** – We may use a tool called "Google Analytics" to collect information about use of this site. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site. We use the information we get from Google Analytics only to improve this site. Google Analytics collects only the IP address assigned to you on the date you visit this site, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser.

### **Children**

This site is not intended for children. We do not market any products or services to children under the age of 13. If we become aware that information is or has been submitted by or collected from a child under the age of 13, we will delete this information from our files within the time required by law.

### **Notification of Updates**

Alight Solutions may update this Privacy Statement. If the changes are not material or do not affect previously provided information, we will simply post the revised Privacy Statement on our websites. If the changes materially affect the way we treat your personal information, we will provide notice on this website or by email before we make such a change. We encourage you to periodically review our Privacy Statement so that you'll always know how we protect your personal information.

### **Contact Information**

If you have any questions or concerns about Alight Solutions' use of your personal information or about this Privacy Statement, you can email us at [privacy.info@alight.com](mailto:privacy.info@alight.com).

You may also write to us at:

Alight Solutions  
ATTN: Chief Privacy Officer  
Legal Department  
4 Overlook Point  
Lincolnshire, IL 60069