

# WEBSITE PRIVACY POLICY

## Introduction and Consent

This privacy statement ("Privacy Policy") identifies the type of information the ATU Retirement Funds ("Funds" or "we") collects from a Participant (a "Participant," "you" or "your") of this website, www.atu401k.com (the "Website") and describes how the Funds use and disclose this information. By using this Website, you are consenting to this Privacy Policy. If this Privacy Policy is not acceptable to you, please do not use this Website. If you have any questions about this Privacy Policy, the Website, or the manner in which the Fund uses or discloses personal information, we encourage you to contact us.

## Use and Disclosure of Participant Information

The Funds respect the privacy of Participants of this Website and take steps to prevent unauthorized disclosure of Participant information to third parties. Participant information includes any and all information received by the Funds from Participants of this Website, regardless how such information is received. The Funds collect and store this information to enable the Funds to fulfill their administrative, regulatory or legal obligations or to improve the level of service to Participants. The Funds are the sole owners of the information on this Website. Unless permitted or required by law or court order, the Funds will not disclose, share or sell any Participant information to any other third party without the Participant's prior authorization, except information may be disclosed to the Funds' Trustees, employees, administrators and other professional advisors only to the extent necessary to administer the Funds.

## Personal and Financial Information Collected by the Funds

Throughout this Website, there are forms that allow you to initiate actions, view information, and request information. These forms may ask for contact information (such as name, mailing address, and email address), login and password information, and certain other personal or financial information. Your provision of such information is entirely voluntary.

## IP Address Logging

The Funds' web servers track domain names and/or IP (Internet Protocol) addresses of Participants to measure what pages and features are accessed by visitors. The Funds use software to collect and analyze this information. This information helps us administer the Website, improve content, and improve service.

## Cookies

This Website may use cookies to collect anonymous usage statistics to track Website utilization. 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 the Website to store some information about Participants, allowing the Website to recognize a Participant and respond appropriately. Identifiable visitor information may also be stored in internal log files. The Funds use this information to troubleshoot issues, improve online services, and for analytical purposes, such as analyzing trends, administering the Website, tracking Participant movements, and gathering broad demographic information. The Funds also utilize this information to ensure basic functionality for authenticated Participants, including but not limited to initiating and terminating valid sessions.

## Links to Other Websites

The Website may contain links to other websites not affiliated with the Funds. The Funds are not responsible for the privacy practices or the content of such other websites. By including links to other websites, the Funds neither endorse such websites nor guarantee the information they contain is accurate. The Funds encourage you to be aware when you leave the Website to read the privacy policies of every linked website as the privacy policies of each may differ from this Privacy Policy. This Privacy Policy applies solely to this Website.

## Security

The Funds are committed to preventing unauthorized third parties from accessing the personal information you provide to us, and we maintain commercially reasonable procedures and technology designed for this purpose. This Website has reasonable technical and organizational security measures in place to protect the loss, misuse or alteration of information under our control, such as Secure Sockets Layer (SSL) encryption technology. Although we cannot guarantee that our systems are 100% secure 100% of the time, we periodically update and test our technology in order to improve the protection of Participant information.

Your participation is also important to the Funds' security efforts. We suggest you take steps to protect your computer's security. Please see the [Cybersecurity Notice](#) for more information.

The Funds do not email Participants requesting their login or password information. If you receive an email purporting to be from the Funds requesting your personal, financial, or login information, do not provide such information unless you have first verified that the email is actually from the Funds. Such emails may be fraudulent and used in connection with scams known as phishing. The Funds request that you report any suspicious emails, websites, or other activity to the Funds.

#### **Other Fund Policies**

Your use of this Website may also be governed by other terms and conditions contained on separate Participant agreements and terms of use.

#### **Governing Law and Jurisdiction**

This Privacy Policy, and the Funds' collection, use and disclosure of Participant information, shall be governed and interpreted in accordance with the laws of the United States and, to the extent not preempted by federal law, the state of Maryland.

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

The Funds reserve the right to change this Privacy Policy at any time without prior notice. Any changes to the Privacy Policy will be posted on this page and will be effective immediately upon posting.

**This Privacy Statement was last updated May 2023.**