

## **EFS Advisors® Privacy Promise**

This Privacy Policy was updated on March 3, 2022.

When you use Educators Financial Services or Advanced Advisor Group, LLC's products, services, or website (collectively, "EFS" or "EFS Advisors"), we understand that you are trusting us with some of your personal and sensitive information. We take this responsibility seriously and work hard to protect your personal information.

We have developed this Privacy Policy to help you understand what personal information we collect, how we collect it, why we collect it, and how we use it. **BY USING EFS'S WEBSITE, PRODUCTS, OR SERVICES YOU ARE CONSENTING TO THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY SO PLEASE READ THIS CAREFULLY. IF YOU DO NOT CONSENT, DO NOT USE EFS'S WEBSITE, PRODUCTS, OR SERVICES.**

Please review our Privacy Policy below and contact us if you have any questions.

### **What personal information we collect**

Personal information is data that can be used to identify a single person. You may be asked to provide your personal information when you are in contact with EFS or an affiliate of EFS. EFS and its affiliates may share this personal information with each other and use it in accordance with this Privacy Policy. EFS and its affiliates may use this information to provide and improve our services, content, marketing, and products. We need accurate, current health and financial information about you so that we can determine your insurability and recommend products to meet your specific needs at a fair price. We collect personal information that you provide to us on applications, forms, emails, online, and in interviews. In addition, we may receive information resulting from your transactions with any companies with whom we have business relationships. In some cases, we also may receive information from consumer reporting agencies and other sources in the course of processing, underwriting, or administering your accounts. You are not required to provide the personal information requested, however, if you choose not to do so, we may not be able to provide you with certain services, products, or requests.

We may have received your personal information from other persons if that person has listed you as a trusted contact or invited you to participate in an EFS service or product.

We automatically collect and store certain types of information about your use of our services, products, and website, including information about when and how you access our services and products. Like many other websites, we may use "cookies" to enhance user experience. You may choose to set your web browser to refuse cookies, or to alert you when cookies are being sent. If cookies are turned off or refused, some parts of the website may not function properly.

If you are a potential candidate for employment or a contractor role with EFS, we may have received your personal information from third parties such as recruiters or external websites. We will use the personal information we receive to contact you about a potential opportunity or in evaluating your candidacy.

When you create a User ID, upload/mail/email content, connect to any of our services, contact us, or participate in a survey or benefit program, we may collect a variety of information, including your name, mailing address, email address, phone number, device identifier, IP address, location information, or financial information.

When you share information about yourself and others such as a trusted contact, EFS may collect the information you provide such as name, mailing address, email address, and phone number. EFS will use this information to respond to your requests, provide relevant services or products, or for anti-fraud purposes.

In certain situations we may ask for a government issued ID or social security number including when setting up a new account or as required by law.

You have the right to see and correct any personal information we may collect about you. If you believe any of the information we have collected about you is erroneous, we would appreciate your assistance in making corrections.

### **What we do with your personal information**

We may use your personal information, such as address or email address, to keep you posted on EFS's latest services, products, promotions, or upcoming events. If you do not want to be on our mailing list for these items, you can opt out at any time by sending us a written request.

We also use personal information to help develop, improve, update, and operate our services, products, content, and advertising. We may also use personal information internally for things such as data analysis and research to improve EFS's services, products, and customer communications.

Additionally, we use your personal information for loss prevention, anti-fraud, network security, and account security only when we have assessed that it is strictly necessary to protect our customers or our services.

We may use your personal information to verify identity and to determine appropriate services or products. For example, we may use date of birth to determine benefit eligibility. As another example, we may validate the information provided by you when creating a User ID with a third party for security and fraud prevention purposes.

We may share your personal financial and health information with authorized employees, representatives, and trusted third parties, whose services or products are used to assure the highest level of service to you. For example, we may cooperate with other reputable financial institutions or software providers to bring additional products and services to your attention. We will choose these partners carefully and hold them to our own high standards of respect for your privacy.

We may use your personal information for compliance with EFS's legal obligations, such as to satisfy a contract to which you are a party, either directly or indirectly, to protect your best interests, or when it is necessary for the purposes of the legitimate interests pursued by EFS or a third party to whom it may be necessary to disclose information.

We may use your personal information to send important disclosures and notices required by law. Because this information is required of EFS, you may not opt out of receiving these communications.

If you apply for a position at EFS or we receive your information in relation to a potential role at EFS, we may use your information to evaluate and contact you.

### **Nonpersonal information collection and uses**

We collect certain data in a form that does not, on its own, enable direct association with any specific person. We may collect, use, transfer, and disclose non-personal information for any purpose. For example, we may collect information such as occupation, income, benefit participation, zip code, area code, school district, unique device identifier, referrer URL, location, and time zone where our services, products, or website is accessed so that we can better understand customer behavior and improve our services, products, and advertising.

We may collect information regarding customer activities on our website and aggregate it to analyze which parts of our website, services, and products are of most interest to consumers.

If we do combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

### **How we protect your personal information**

We use appropriate security measures for data collection, storage and processing in order to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our website. Do not send any confidential information to EFS through unsecured or unencrypted electronic communications and do not share your username and password with anybody, as we cannot be responsible for identity theft from a user's actions.

We do not sell, trade, or rent your personal information to others. We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners or trusted affiliates for the purposes outlined above. We may use third party service providers to help us operate our business and the website or administer activities on our behalf, such as sending out newsletters, packets, or surveys. We may share your general information with these third parties for those limited purposes.

### **Your Acceptance of These Terms**

By using EFS's services, products, or website, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our services, products, or website. Your continued use of our services, products, or website following the posting of changes to this policy will be deemed your acceptance of those changes.

Above all, we value your trust and your confidence in our ability to manage and protect your important personal information. You have our word that we will protect your information as if it were our own.

As a consumer and our customer, you have the right to "opt-out" of certain uses of your personal information as described in this policy. To "opt-out", please mail your request to EFS Advisors, 1995 E. Rum River Dr. S, Cambridge, MN 55008.