

Privacy Notice

Our Pledge to You

Consumer Privacy Notice

Protecting your privacy is important to us. We want our customers to understand what information we collect and how we use it.

Why We Collect Your Information

We gather information about you and your accounts so that we can (i) know who you are and thereby prevent unauthorized access to your information, (ii) design and improve the products we offer and (iii) comply with the laws and regulations that govern us.

Confidentiality and Security

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products and services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards and regulations to guard your information.

What Information We Collect

We may collect the following types of 'nonpublic personal information' about you:

- Information about your identity, such as your name, address and social security number;
- Information about your transactions with us;
- Information we receive from you on applications, such as your beneficiaries or income.

'Nonpublic Personal Information' is nonpublic information about you that we obtain in connection with providing a financial product or service to you, such as that described in the examples above.

What Information We Disclose

We are permitted by law to disclose nonpublic personal information about you to other third parties in certain circumstances. For example, we may disclose nonpublic personal information about you to third parties to assist us in servicing your account with us (i.e., mailing of fund related materials) and to government entities (e.g., IRS for tax purposes).

We will continue to adhere to the privacy policies and practices described in this notice even after your account is closed or becomes inactive.