

The Burke Group Privacy Policy

Last Modified on: January 1, 2024

1. Introduction

This policy describes how The Burke Group, LLC and The Burke Group, Inc. (collectively, "**The Burke Group**" "**Company**" or "**We**") may collect, use, share, retain and protect your Personal Information through our websites (the "**Website**"). This privacy policy applies to your Personal Information, which can include any information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you, your house, or your device ("**Personal Information**").

Please read this policy carefully. This policy may change from time to time (see "**Changes to Our Privacy Policy**"). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Please click on the following links to go to the corresponding sections of this privacy policy:

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2. Information our Privacy Policy Covers

This privacy policy applies to Personal Information the Company obtains through their website including electronic messages between you and the website, as well as information provided by a plan sponsor or employer regarding you as a Participant. It does not apply to information collected by us offline or through any other means.

Our Website may have links to websites and/ or applications operated and maintained by third parties. We have no control over the privacy practices of websites or applications we do not own and encourage you to review all third party privacy policies carefully.

3. Children Under the Age of 18

Our Website is not intended for children under 18 years of age. No one under age 18 may provide any information to or on the Website. We do not knowingly collect Personal Information from children under 18. If you are under 18, do not use or provide any information on this Website or through any of its features. If we learn we have collected or received Personal Information from a child under 18, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at privacy@burkegroup.com.

4. Information We Collect

The Personal Information that we collect from you depends on how you interact with us and our products and services. The following table lists the categories of Personal Information and the specific pieces of Personal Information we have collected within the last twelve (12) months. Please see "**How We Collect Your Personal Information**", "**How We Use Your Personal Information**", and "**How We Share Your Personal Information**" for more detailed information.

We will not sell the Personal Information we collect. However, we will share it with our service providers.

Category	Specific Information Collected	Business Use Purpose	Shared
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, telephone number, email address, account name and password, Social Security number, driver's license number, passport number, or other similar identifiers, gender, marital status and pertinent beneficiary information.	To provide our services to you	Yes, with Service Providers and as set forth herein
B. Financial information	Financial information, account number, balance, investment criteria, retirement date and goals, investment funds, payroll information, including compensation and hours worked.	To provide our services to you	Yes, with Service Providers and as set forth herein
C. Commercial information.	Records of investments made, products, obtained, or considered.	To provide our services to you	Yes, with Service Providers and as set forth herein

D. Internet or other similar network activity.	Browsing history, search history, pages viewed, and transactions requested during your interaction with our website.	To provide our services to you and improve our website	Yes, with Service Providers and as set forth herein
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5. How We Collect your Personal Information:

We collect Personal Information about you from various sources, including:

- Directly from you, such as.
 - Information that you provide on our Website, including by including contact us submissions and/or managing your investments online. This includes information provided at the time of registering to use our Website, subscribing to our service, or requesting further services.
 - Records and copies of your correspondence, if you contact us.
 - Details of transactions you carry out through our Website
 - Your search queries on the Website.
 - When you sign up to receive emails, and/ or postal mailings about your investments.
- Directly from your employer or plan sponsor if you are a plan participant.
- Automatically, when you navigate through the Website such as.
 - usage details, IP addresses, and information collected through cookies, web beacons, clear GIF, pixels, internet tags, web server logs and other data collection tools. For more information, please see "**Automatic Data Collection Technologies**" below.

6. Automatic Data Collection Technologies

As you navigate through and interact with our Website, we use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- Web Beacons. Pages of our Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or and for other

related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

7. **How We Use your Personal Information**

We may use, or disclose the Personal Information we collect for one or more of the following purposes:

- **Providing Our Website.** We use Personal Information to provide our Website and its content to you, including to provide, personalize, support and develop our Website. We may use Personal Information to allow you to participate in the interactive features of our Website, to notify you about changes to our Website and any products or services we offer through it.
- **Providing Products and Services.** We use Personal Information to fulfill or meet the reason you provided the information. If you are a plan participant, we use the information to administer the plan and provide the related services to you. If you create an account with us, we use your Personal Information to create, maintain, customize, and secure your account with us.
- **Communicating with You.** We use Personal Information to provide you with support and to respond to your inquiries, including to investigate and address your concerns, follow up on your issues and feedback, monitor and improve our responses, and to provide customer service.
- **Analytics and Personalization.** For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- **Security and Fraud Prevention.** We use Personal Information to help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business. We may also use such information if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of The Burke Group, our customers, or others.
- **Law Enforcement.** We use Personal Information to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations. We also use such information to comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- **Business Transfers.** We may share Personal Information with another company to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our customers is among the assets transferred.

8. **How We Share Your Personal Information**

We do not sell Personal Information. We disclose Personal Information in the following circumstances:

- **Corporate Affiliates.** We may share Personal Information with our corporate affiliates, including The Burke Group, LLC and The Burke Group, Inc. Such corporate affiliates process Personal Information on our behalf as our service provider, where necessary to provide a product or service that you have requested, or in other circumstances with your consent or as permitted or required by law.
- **Service Providers.** We share certain Personal Information with third parties that perform services to support our core business functions and internal operations including: record keeping and administrative services, plan compliance services, preparation of form 5500s, distribution withdrawal and loan processing and associated tax reporting and information technology support. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the Personal Information confidential, and prohibit using the disclosed information for any purpose except performing the contract.
- **Legal Process.** We may disclose Personal Information in response to subpoenas, warrants, court orders, including qualified domestic relations orders (QDROs), government inquiries or investigations, or to comply with relevant laws and regulations. We may also disclose information to establish, exercise, or protect the rights of our company, employees, agents, and affiliates; to defend against a legal claim; to protect the safety and security of our visitors; to detect and protect against fraud; and to take action regarding possible illegal activities or violations of our policies.
- **Business Transfers.** We may share Personal Information with another company that buys some, or all, of the assets or stock of The Burk Group, Inc. and/or The Burke Group, LLC, and that company may use and disclose Personal Information for purposes similar to what is described in this policy. We may also share Personal Information with prospective purchasers to evaluate the proposed transaction.
- **Other Instances.** We may ask if you would like us to share your information with other third parties who are not described elsewhere in this privacy policy.

9. How We Protect your Personal Information

We have implemented administrative, physical and technical safeguards designed to protect your Personal Information. All information you provide to us is stored on secure servers behind firewalls. Any transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone and that you change it frequently, at least every 90 days. We ask that you activate two factor authentication and establish personal security questions to protect your account. We also ask that you monitor your account regularly for unfamiliar activity and that you notify us immediately at privacy@burkegroup.com if anything looks suspicious.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Website. Any transmission of Personal Information is at

your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

10. Choices About How We Use and Disclose Your Personal Information

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information that we collect automatically:

Tracking Technologies. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

11. Accessing and Correcting Your Personal Information

You can review and change your Personal Information by logging into the Website and visiting your account profile page, by contacting the plan sponsor, or by contacting your employer.

12. Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Website home page. If we make material changes to how we treat our users' Personal Information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

13. Communicating With Us

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

300 Meridian Centre, Suite 100
Rochester, NY 14618

585-624-5500

privacy@burkegroup.com