



Alight Solutions LLC is committed to protecting your privacy. This Privacy Statement (“Statement”) explains how Alight Solutions, our subsidiaries and affiliates (collectively, “Alight,” “we,” “our” or “us”) collect, use and share your information when you visit our websites (collectively, the “Sites”) or use our services (the “Services”) and the choices you can make about what information you share. This Statement applies only to and covers only information collected in connection with your use of, the Sites and Services. It does not apply to information you may provide to Alight – or Alight may receive about you – other than through the Sites and Services where this Statement is posted.

Please read this Statement carefully.

Alight is the entity responsible for processing information (i.e., the controller) under this Statement

Changes to this Statement

Please read this Statement from time to time. We may modify the Statement at any time in our sole discretion. If we make material changes to the Statement that significantly change how we use your personal information, we will use reasonable efforts to bring these changes to your attention either through an email to your registered email address or by another means.

What type of information does Alight collect?

We collect information about you when you visit and use our Sites and Services.

For instance, over the past 12 months, we may have collected information from you when you register for events, request our Services, create and manage accounts, access various content and features or directly visit our Sites, including, but not limited to, the following information:

- Contact information, such as name, e-mail address, postal address, phone number and mobile number;
- Identifiers, such as date of birth, your gender, marital status, username, social security number, driver's license number, passport number, financial account number, physical characteristics or description, or other similar identifiers;
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with our website;
- Identifiers, such as date of birth, user name, password, social security number, driver's license number, passport number, financial account number, or other similar identifiers;
- Communication preferences and contact information about others when you refer a friend to a particular site or service (note: this information is used solely to facilitate requested communications); and
- information posted in community discussions and other interactive online features.

We also may collect information related to life, health, professional liability and workers compensation insurance or employee benefit programs based on the exceptions listed in Art.9 subsection 2 GDPR, including the affected person's consent. Such information may include employment details and benefit coverage, as well as sensitive information, such as financial details and health-related information.

In some instances, Alight automatically collects information about the devices you use to interact with our Sites and Services. The information we automatically collect may include your IP address, unique device identifier, type of operating system used, mobile carrier and your browser location. We may also use cookies and other online tracking technologies, as described below. When you provide us your mobile device phone number as your contact phone number, you consent to the use of your mobile device phone number for the purposes identified in this Statement.

Some browsers have "do not track" features that allow you to tell a website not to track you online. These features are not uniform and we may not respond to those signals.

Links to Other websites: Our Sites may contain links to other sites that are outside of our control and are not covered by this Statement. If you access other sites using the links provided, the operators of those sites may collect information from you which will be used by them in accordance with their own privacy statements. We encourage you to read the privacy statements on other websites you visit. Alight is not responsible for the content or privacy practices of linked sites or any use of those sites.

Please be aware that our Sites may contain links to sites maintained by other Alight entities that also are not governed by this Statement but by other privacy statements that may differ slightly from this Statement. We encourage you to review the privacy statement of each website you visit.

How does Alight use your personal information?

We may use the personal information we collect about you, including your financial information and health-related information, for a number of business purposes, including the following:

- Provide the information and Services requested;
- Determine eligibility and process applications for products and services;
- Understand and assess clients' ongoing needs;
- Carry out client communication, service, billing and administration;
- Administer claims;
- Conduct data analysis to understand how the Sites and Services are used and to perform other market research;
- Obtain and update credit information with appropriate third parties, such as credit reporting agencies, where transactions are made on credit;
- Execute monitoring and training;
- Develop new services;
- Operate and serve the function of the Sites and Services;
- Manage our everyday business needs, such as administering and improving our Sites and Services;
- Analyze the performance and functioning of the Sites;
- Prevent fraud, enforce our Terms of Use, comply with applicable laws and Alight's reporting obligations, and enforce our agreements;
- Market products and services that may be of interest to you if further legal requirements for this are fulfilled; and
- Conduct processing necessary to fulfill other contractual obligations for the individual.

We will not use this information for automated individual decision-making, including profiling, in the sense of Art. 22 GDPR. In the past 12 months, we have not sold any personal information that we may have collected

We will retain your information for as long as your account is active or as long as the retention of data can be justified by a legitimate interest in the sense of Art. 6 GDPR. Furthermore, we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

We may also use your personal information for additional purposes in the future but if we do, we shall do so in accordance with applicable data privacy law.

When does Alight disclose your personal information?

In the past 12 months, we may have shared your personal information for the following business purposes:

With our service providers: We may share your information, including your financial information and health-related information, with third-party service providers and vendors who perform services on our behalf but only if (a) the sharing of your personal information is necessary for them to carry out such support services and (b) those service providers are required to use any personal information they receive in accordance with Alight's instructions and pursuant to a data processing agreement that complies with the requirements of applicable data privacy law.

With our business partners: We may share your personal information with our business partners with whom we work to provide you with products and services. Such business partners include credit and fraud reporting agencies; debt collection agencies; insurers; reinsurers; and managed fund organizations for financial planning, investment products and trustee or custodial services related to banking and financial products in which you invest. In addition, we may share with our other partners such as insurers; reinsurers; other insurance intermediaries; insurance reference bureaus; medical service providers; fraud detection agencies; our advisors such as loss adjusters, lawyers, and accountants; and others involved in the claims handling process if further legal requirements for this are fulfilled.

In the event of corporate change: We may disclose personal information to a successor to all or part of our business or in connection with a corporate merger; consolidation or restructuring; sale of substantially all of our stock and/or assets; or other corporate change, including, without limitation, during the course of any due diligence process. If necessary and legally required, we will obtain your separate consent in this regard. Disclosure may also be required for company audits or to investigate a complaint or security threat.

To comply with legal requirements: We will disclose your information (i) if we are required to do so by law or legal process, (ii) in response to lawful law enforcement authority or other government official requests, (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (iv) in connection with an investigation of suspected or actual illegal activity including any legal proceedings or prospective legal proceedings in order to establish, exercise or defend our or a third party's legal rights or (v) as required for company audits or to investigate a complaint or security threat.

To companies within our corporate family: We may disclose your personal information to our corporate affiliates for organizational purposes based on a legitimate interest. To the extent that our corporate affiliates have access to your personal information, they will follow practices that are at least as restrictive as the practices described in this Statement, will use your information solely for the purpose for which it was provided, and will not further disclose your information.

The personal information that may have been shared in the past 12 months for these business purposes includes the categories of personal information listed in the [What type of information does Alight collect](#) section above.

How does Alight use cookies and other tracking technologies?

When you visit our Sites, we may place pieces of code, commonly referred to as "cookies," or similar technology on your device. A cookie is a piece of programming information contained in a very small text file that is placed in your Internet browser or elsewhere on your hard drive. You can control acceptance of cookies by modifying your Internet browser preferences. You have the ability to accept all cookies, to be notified when a cookie is set or to reject all cookies. Please note that, if you choose not to consent to all cookies (including essential cookies) you may not be able to access all or part of our site and may be unable to use those services or engage in activities that require the placement of cookies. Alight uses cookies to distinguish you from other users of our website and to help us compile aggregate statistics about usage of our websites.

In addition, on some occasions, Alight may use tracking technologies such as web beacons, to collect information about your visits to our Sites. These are small electronic images embedded in web content or e-mail messages and are ordinarily not visible to users. Like cookies, this tracking technology enables us to track pages and content accessed and viewed by users on the Sites. The use of these technologies also helps us to provide you with a positive experience when you browse our Sites, and it also helps refine our content and personalize your experience.

You can control cookies and tracking tools. Your browser may give you the ability to control cookies or other tracking tools. How you do so depends on the type of tool. Certain browsers can be set to reject browser cookies. Flash cookies, which we may use on certain web sites from time to time, cannot be controlled through your browser settings. Options you select are browser and device specific.

For more detailed information, you may wish to visit our [Cookie Notice](#).

For more detailed information about cookies, you may wish to visit www.allaboutcookies.org.

If you are located in the EU, we will obtain your consent before storing cookies on your browser. For more information about the development of user profiles and the use of targeting/advertising cookies, please see www.youronlinechoices.eu.

What does Alight do with your social network information?

You can engage with us through third-party social network sites or through features on our Sites such as plug-ins or applications that integrate with social network sites.

You may also choose to link your account with us to third-party social network sites. When you link your account or engage with us on or through third-party social network sites, plug-ins, or applications, you may allow us to have ongoing access to certain information from your social network account (e.g., name, e-mail address, photo, gender, birthday, the posts or the 'likes' you make). When you use social media plug ins we have provided, your personal information will also be disclosed to the third party social network.

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How does Alight protect your personal information?

Alight has implemented reasonable physical, technical and administrative security standards to protect personal information from loss, misuse, alteration or destruction. Whilst we endeavour to keep our systems and communications protected against tracking viruses and other harmful effects we cannot bear responsibility for all communications being virus-free.

How can you access and update your personal information?

California residents, please see Notice to California Residents section below.

Alight takes reasonable steps to keep your personal information accurate and complete. You can access or update your personal information in the following ways.

Profile: If you have created a profile or account on one of our Sites, you can update your contact information after you log into your account.

Newsletters: If you request electronic communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in the communication.

Mobile Devices: If you previously chose to receive push notifications on your mobile device from us but no longer wish to receive them, you can manage your preferences

either through your device or the application settings. If you no longer wish to have any information collected by the mobile application, you may uninstall the application by using the uninstall process available on your mobile device.

Cookies: As described in our [Cookie Notice](#), you can adjust your browser settings to accept or refuse cookies.

Email: Contact us at the e-mail or postal address listed in the “Contact Us” section at the bottom of this Statement. Please include your current contact information, the information you are interested in accessing and your requested changes. We will provide you access to the personal information requested, subject to reasonable limitations provided by law, unless it infringes on the privacy of other individuals.

Can you opt out of receiving marketing communications from Alight?

Yes. Alight may send marketing emails to you about our services, if you consented in such marketing measures. If you wish to discontinue such communications, you may unsubscribe by following the opt-out method provided in the communications. In addition, you may communicate your choice to opt out via an email to Alight at privacy.info@alight.com.

California residents, please see Notice to California Residents section below.

How does Alight protect children’s privacy?

Our Sites are general audience sites not directed at children under the age of 16. If you are under the age of 16 please do not provide personal information to us through the Sites. If we obtain actual knowledge that any information we collect has been provided by a child under the age of 16, we will promptly delete the information.

Does Alight transfer personal information to other countries?

Information that you provide to us may be stored on servers and with third-party service providers in the United States and other countries in which we do business and whose data protection laws may differ from the jurisdiction in which you live. When we transfer the personal information of users who are located in the EU to a location outside of the European Economic Area for processing, we use an approved transfer mechanism such as the European Commission approved standard

contractual clauses. To learn more about the transfer mechanism that we use to effect such transfer, you may contact us at privacy.info@alight.com.

Notice to residents of California

If you are a California resident, California law provides you with certain rights.

Please read

These rights may be limited or inapplicable by law if you are an employee of Alight.

If you are an employee of a client (i.e., your employer) receiving services from Alight, Alight receives your information solely for the purposes of completing a business purpose of our clients and does not use or disclose your information except as necessary to accomplish the business purpose for which we received your information. In these circumstances, Alight's client remains primarily responsible for your information. As a result, we may re-direct a query about our use of your information to our client for response.

California Civil Code Section 1798.83 permits you to opt out of the disclosure of your personal information by Alight to third parties for those third parties' direct marketing purposes. We do not disclose your personal information to third parties for the third parties' direct marketing purposes unless you affirmatively agree to it. If this Statement were to change, you can opt-out of such disclosures by sending us an email privacy.info@alight.com or sending written request to Chief Privacy Officer, Alight Solutions LLC, 4 Overlook Point, Lincolnshire, IL 60069.

To make such a request, please send an email with a detailed description of the specific content or information to privacy.info@alight.com. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal, even when requested.

Beginning on January 1, 2020, pursuant to California Civil Code 1798.100 et seq., the California Consumer Privacy Act of 2018 ("CCPA"), California residents have the following, additional rights:

Your Right to Access Specific Information and Data Portability: You may request that we disclose certain information to you about our collection and use of your personal information in the past 12 months. Once we receive and confirm your personal information request, we will disclose to you up to the limits permitted under applicable law:

- The categories and specific pieces of personal information we collected about you;
- The categories of sources for the personal information we collected about you;

- Our business or commercial purpose for collecting that personal information;
- The categories of third parties with whom we share that personal information; and
- If we sold or disclosed your personal information for a business purpose, two separate lists identifying: (a) the categories of your personal information collected and sold, and the categories of the third parties to whom the data was sold; and (b) the categories of your personal information that was disclosed for business purposes.

Your Right to Request Deletion: You may request that we delete any of the personal information that we collected from you and retained, subject to certain exceptions. We may deny your request if the information that you are requesting we delete relates to your past, current or prospective employment with Alight, including but not limited to information necessary to administer Alight's employee benefits programs.

We may also deny your request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with California Penal Code Section 1546 et seq. (the California Electronic Communications Privacy Act);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Your Right to Opt-Out: We do not sell personal information to third parties. If that should change, subject to certain limitations, you will have the right to direct us not to sell your personal information.

Exercising Your CCPA Rights: To exercise any of the CCPA rights described above beginning on January 1, 2020, please submit a verifiable personal information request to us by either emailing us at privacy.info@alight.com or writing to us at the mailing address provided below.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may submit a personal information request. If you elect to use an authorized agent to make a request on your behalf, Alight may require additional information from the authorized agent. *At this time, the CCPA does not provide employees or representatives of our business partners with the right to make information requests.*

You may only submit two personal information requests within a 12-month period. The verifiable personal information request must:

- Either (a) be submitted via your account with one of our sites; or (b) provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information, or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

Response Timing and Format: We endeavor to respond to a personal information request within 45 days of our receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. If provided electronically, we will select a format to provide your personal information that is in a portable and readily useable format. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your personal information request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Your Right to Non-Discrimination: Unless permitted or required by law, if you exercise any of your rights under the CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services, or a different level or quality of goods or services.

At this time, Alight does not offer any different rates for goods or services based on your decision to opt-out of certain information sharing. If that changes in the future, Alight will disclose the financial terms of the revised rates.

Notice to individuals located in the European Union

Alight processes personal information for the purposes described above. If we use personal information for purposes other than as described in this Statement, we will provide you with specific notice at the time of collection or before we use your data for such new purposes. In addition, we will respond to requests to fulfill your rights as data subjects in the European Union, as required under EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

Legal Basis for Processing Information: We process personal information only when we have a legal basis to do so. The legal basis we will rely on will be one of the following:

- You have consented to the processing of your personal information. You can withdraw your consent at any time;
- The processing is necessary to perform a contract with you (or to take steps at your request prior to entering a contract);
- The processing is necessary to comply with a legal obligation that applies to Alight; or
- The processing is necessary for purposes that are in Alight's legitimate interests, such as protecting the security of our Sites and Services, conducting market research to improve our products and Services, improving the functioning of our Sites, and providing you with promotional material about our products and Services, provided always that such processing is fair, and balanced and that our processing does not unduly impact your rights.

Your Choice to Provide Information: You can choose not to provide personal information to Alight by refraining from, among other things, using our Services and requesting information. You also may refrain from submitting information directly to us. However, if you do not provide personal information when requested, we may not be able to provide you with the full range of our products and Services, or with information about our products, Services, promotions and other opportunities.

Your Rights: You generally have certain rights regarding the personal information that we maintain about you, which in certain circumstances, you will be able to exercise. These rights are as follows:

- You may request a copy of the personal information that we maintain about you. If we maintain your personal information based on your consent or so that we could enter into a contract with you, you can also request that we provide you a copy of your data in a structured, commonly used, and machine readable format.
- If your personal information is incorrect, you may request that we correct, amend or delete personal information that is inaccurate or incomplete.
- You may request that we erase or restrict the processing of your personal information if there is disagreement about its accuracy or legitimate usage.
- When our legal basis for processing your information is your consent, you may withdraw your consent at any time.

- You may object to the processing of your personal information in certain circumstances when we (i) process your information for the purposes of our legitimate interests, (ii) use your personal information for direct marketing; or (iii) use your personal information for statistical purposes.

Individuals who desire to make an individual rights request in accordance with the GDPR are directed to make such a request via Alight's privacy mailbox at privacy.info@alight.com. Such requests will first need to be verified by 'reasonable means' and an individual will be asked to specify the information the request relates to. Subject to applicable law, we will comply with your request as soon as practicable, and in any event, within one month after receiving a valid request. If your request is particularly complicated, we may have to extend this period to 2 months. Access and correction may be done for free, unless requests are repetitive, excessive or unfounded, in which case we may charge you the administrative costs we have incurred handling the request.

Complaints: If you are unhappy or have concerns about the way in which we have handled your information, please contact us (see "Contact Us") so that we can try to resolve the issue. You also have the right to lodge a complaint with the applicable supervisory authority in the EU.

Contact Us

If you have any questions relating to this Privacy Statement, please contact us at privacy.info@alight.com.

You may also write to us at:
Alight Solutions LLC
ATTN: Chief Privacy Officer
4 Overlook Point
Lincolnshire, IL 60069