

## 1. Introduction

EGPS ("we," "us," or "our") is a third-party administrator of retirement plans. We are committed to protecting the privacy and security of personal information entrusted to us by plan sponsors, plan participants, and beneficiaries. This Privacy Policy describes how we collect, use, disclose, and safeguard your information in connection with our retirement plan administration services.

This policy applies to information collected through our websites, portals, and in connection with the retirement plan administration services we provide. By using our services, you acknowledge the practices described in this Privacy Policy.

## 2. Information We Collect

As a retirement plan administrator, we collect several categories of personal information necessary to administer your retirement benefits:

### Contact and Identification Information

- Full legal name and date of birth
- Mailing address, email address, and phone number
- Social Security Number or Tax Identification Number
- Government-issued identification

### Financial Information

- Bank account and routing numbers for distributions and rollovers
- Contribution amounts and investment elections
- Account balances, transaction history, and plan loan information
- Tax withholding elections and 1099-R information
- Compensation Amounts

### Health and Sensitive Information

- Disability status and medical information (where required for disability distributions or qualified medical expense determinations)
- Dependent and beneficiary information, including relationships
- Information related to qualified domestic relations orders (QDROs)

## 3. How We Use Your Information

We use the personal information we collect for the following purposes:

- **Plan Administration:** Processing contributions, distributions, loans, rollovers, and other plan transactions
- **Regulatory Compliance:** Fulfilling obligations under ERISA, the Internal Revenue Code, HIPAA, DOL, PBGC and other applicable federal and state laws
- **Recordkeeping:** Maintaining accurate plan records as required by law
- **Communications:** Sending required plan notices, statements, and disclosures
- **Tax Reporting:** Issuing required tax forms (e.g., Form 1099-R, Form 5500 support)
- **Security and Fraud Prevention:** Detecting, investigating, and preventing fraudulent transactions and unauthorized access
- **Service Improvement:** Improving the quality and efficiency of our plan administration services

## 4. Legal Basis and Compliance

- **ERISA Compliance:** As a retirement plan administrator, we are subject to the Employee Retirement Income Security Act of 1974 (ERISA). We act as a plan service provider and handle plan assets and participant data in accordance with our fiduciary and contractual obligations.
- **HIPAA Compliance:** To the extent we handle protected health information (PHI) in connection with welfare benefit plans or disability determinations, we comply with the Health Insurance Portability and Accountability Act (HIPAA) and its implementing regulations. We enter into Business Associate Agreements (BAAs) with covered entities as required.
- **California Consumer Privacy Act (CCPA):** California residents may have additional rights regarding their personal information. Please see Section 9 for California-specific disclosures.
- **IRS and DOL Requirements:** We comply with applicable Internal Revenue Service (IRS) and Department of Labor (DOL) regulations governing retirement plan recordkeeping and reporting.

## 5. How We Share Your Information

We do not sell your personal information. We may share your information in the following circumstances:

- **Plan Sponsors:** We share information with the employer or plan sponsor as necessary for plan administration and compliance
- **Service Providers:** We engage trusted third-party vendors (e.g., custodians, actuaries, auditors, technology providers) under contracts requiring them to protect your information
- **Investment Providers:** We share necessary information with recordkeepers, mutual fund companies, insurance carriers, and other investment providers to process transactions
- **Legal and Regulatory Authorities:** We may disclose information to the IRS, DOL, or other government agencies as required by law
- **Legal Proceedings:** We may disclose information in response to a valid court order, subpoena, or QDRO
- **Business Transfers:** In the event of a merger, acquisition, or sale of assets, participant information may be transferred to a successor administrator subject to the same privacy commitments

## 6. Data Security

We implement administrative, technical, and physical safeguards designed to protect your personal and financial information from unauthorized access, use, or disclosure. These measures include:

- Encryption of data in transit and at rest
- Multi-factor authentication for system access
- Role-based access controls limiting data access to authorized personnel
- Regular security assessments and employee training
- Incident response procedures

While we strive to protect your information, no security system is impenetrable. In the event of a data breach affecting your information, we will notify affected individuals and regulatory authorities as required by applicable law.

## 7. Data Retention

We retain participant records for as long as necessary to administer the plan and as required by ERISA, the IRS, and other applicable regulations. Generally, plan records are retained for a minimum of six (6) years following the plan year to which they relate, though certain records may be retained longer based on legal requirements or active plan participation.

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## 8. Your Rights and Choices

Depending on your state of residence and applicable law, you may have the following rights:

- Access: The right to request a copy of personal information we hold about you
- Correction: The right to request correction of inaccurate information
- Deletion: The right to request deletion of certain information, subject to our legal retention obligations
- Opt-Out: The right to opt out of any marketing communications from EGPS

To exercise any of these rights, please contact us using the information in Section 11. Note that certain rights may be limited by our legal obligations under ERISA and other applicable laws.

## 9. California Residents (CCPA)

If you are a California resident, you have rights under the California Consumer Privacy Act (CCPA), including the right to know what personal information we collect, the right to delete personal information, and the right to non-discrimination for exercising your privacy rights.

Note: Much of the personal information we handle as a retirement plan administrator may be exempt from CCPA as it relates to employment or benefits administration. However, we honor CCPA rights to the extent applicable.

To submit a CCPA request, please contact us at the address below. We will respond within 45 days of receipt of a verifiable consumer request.

## 10. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or services. We will notify plan sponsors of material changes and post the updated policy on our website. We encourage you to review this policy periodically. The effective date at the top of this document reflects the date of the most recent revision.

## 11. Contact Us

If you have questions or concerns about this Privacy Policy, wish to exercise your privacy rights, or need to report a privacy concern, please contact us:

**Email:** [HR@egps.com](mailto:HR@egps.com)

**Phone:** 888-959-3477

**Mailing Address:** 7734 Excelsior Road, Suite 102 Baxter, MN 56425

For HIPAA-related inquiries, please contact our HR department directly at the address above.

*This Privacy Policy was prepared for EGPS as a third-party administrator of retirement plans. It is intended for informational purposes and does not constitute legal advice. EGPS recommends consulting qualified legal counsel to ensure compliance with all applicable laws and regulations.*