

ALIGHT FINANCIAL SOLUTIONS LLC PRIVACY STATEMENT

WE RESPECT PRIVACY

We at AFS appreciate that you have provided us with your personal financial information. We strive to maintain the privacy of such information. This Privacy Statement describes what non-public personal information we collect about you, why we collect it, and when we may share it with others.

PERSONAL INFORMATION COLLECTED BY AFS

Throughout this Privacy Statement, we refer to the non-public information that personally identifies you as "personal information." To serve its customers better, AFS must collect and maintain accurate non-public information that personally identifies its customers ("Personal Information"). We obtain this information from applications and other forms submitted to us, from your relationship with us, from consumer reporting agencies, from our Web sites, and from third parties and other sources. For example:

We MAY collect the following kinds of Personal Information through applications and other forms submitted to us, such as:

- Identifier and contact information such as your name, date of birth, address, e-mail address, telephone/fax numbers, Social Security Number, mother's maiden name;

- Information about Participant beneficiaries, including, for example, name, Social Security Number, date of birth, address, and telephone numbers;

- Financial information such as net worth, and tax bracket; and

- Banking information such as the name of a bank, its contact information and routing number, the type of account held, and the identification number of those accounts.

We collect Personal Information about transactions conducted through AFS, such as account balances, account activity, and investment history. We collect information about the use of products and services offered by our affiliates, including Alight Solutions LLC (collectively, "Alight Affiliates"). We may obtain Personal Information about customer creditworthiness and credit history from consumer reporting agencies. We may collect Personal Information from other sources in connection with providing or servicing your account.

Through our Web sites, we may collect Personal Information that is provided directly through online communications (such as an e-mail address). We may also collect Personal Information about customers Internet service provider, domain names, computer's operating systems and Web browsers, customers' use of our Web sites and customer product and service preferences, through the use of cookies, as defined above. AFS may use cookies for some administrative purposes, for example, to store its customers' preferences for certain kinds of information. None will contain information that will enable anyone to contact its customers via telephone, e-mail, or any other means. If you are uncomfortable with the use of cookie technology, browsers can be set to refuse cookies. Certain of AFS' services, however, may be dependent upon the use of cookie technology and the disabling of cookies could impede the operation of such services.

PERSONAL INFORMATION DISCLOSED BY AFS

To provide you with the products and services requested, to serve you better, and to manage our business we may disclose Personal Information as required or permitted by law, as described below.

Third Party Financial Service Providers: In order to provide the investment products and services you have requested, we may disclose Personal Information to financial institutions ("Third Party Financial Service Providers"), such as our Clearing Agent as is necessary to meet our obligations to you or as permitted or required by law.

PLEASE NOTE: When you sign up for a financial product or service offered through AFS, the Third Party Financial Service Provider may acquire Personal Information about Participants, including from AFS, from you, and from third parties. The Third-Party Financial Service Provider's use of such Personal Information, including the Personal Information disclosed by AFS, is governed by a separate privacy policy. AFS urges you to review these privacy policies carefully and to exercise any choices you may have about how Third Party Financial Service Providers use and disclose your Personal Information. Again, please refer to the AFS Privacy Statement that may be found at alightfinancialsolutions.com.

Alight Affiliates: In order to manage your account effectively, including servicing and processing transactions, to inform about products and services offered by us, our affiliates, and others, and as otherwise required or permitted by law, we may disclose Personal Information to Alight Affiliates. Such disclosures also may be required under separate agreements you may have with other Alight Affiliates and may be accordingly addressed under a separate privacy policy(ies).

Other Third Parties: Except as described above, we do not disclose Personal Information to non-affiliated third parties except to enable them to provide the products or services you have requested, to provide various other services on our behalf, or as is otherwise required or permitted by law. For example, some instances where we may disclose Personal Information to third parties include: servicing and processing transactions, protecting against fraud, maintaining institutional risk control, responding to judicial process or performing services on our behalf. When we share Personal Information with these companies, they are required to limit their use of that information to the particular purpose for which it was shared and they are not allowed to share it with others except to fulfill that limited purpose.

We respect privacy and do not share Personal Information with third parties for marketing purposes.

PROTECTING PERSONAL INFORMATION

We maintain physical, electronic and procedural security measures to help safeguard the Personal Information we collect. We have internal policies governing the proper handling of Personal Information. We require third parties that provide support or marketing services on our behalf to adhere to confidentiality standards with respect to such information.

Important information for Vermont residents.

If you are a resident of Vermont, and for as long as you remain a resident of Vermont, the information we may share about you with other financial institutions with which we have a joint marketing agreement is limited to your name, contact information, and information about our transactions and experiences with you. Additionally, within the Alight family we will not share certain information (other than information about our transactions and experiences with you) from account applications or information we receive from third parties without your authorization. To authorize the sharing of this information within the Alight family, please contact us directly.

Important information for California residents.

If you are a resident of California, and for as long as you remain a resident of California, the information we may share about you with our affiliates and non-affiliated third parties will be done only in a manner that is permitted under the California Financial Information Privacy Act (CFIPA) and federal law. In general, CFIPA requires us (1) to provide you with notice and the right to tell us not to disclose your Personal Information before we disclose such information to our affiliate or other financial institutions with which we have joint marketing agreements, and (2) to seek your express consent before we disclose your Personal Information to non-affiliated third parties for marketing purposes. Additionally, within the Alight family we will not share certain information (other than information about our transactions and experiences with you) from account applications or information we receive from third parties without your authorization. To authorize the sharing of this information within the Alight family, please contact us directly.

In order to provide the investment products and services you have requested, we disclose Personal Information about you to financial institutions ("Third Party Financial Service Providers"), such as our clearing broker, Pershing LLC as required to meet our obligations to you or as permitted by law.

CONTACT INFORMATION

If you have any questions or complaints about AFS' use of Personal Information or about this Alight Financial Solutions Privacy Statement, please send an email to: privacy.info@alight.com.

AFS reserves the right to amend this Alight Financial Solutions Privacy Statement at any time. We will inform you of any changes to this Privacy Statement as required by law.

Effective: April 1, 2007

AFS RESERVES THE RIGHT TO AMEND THIS ALIGHT FINANCIAL SOLUTIONS PRIVACY STATEMENT AT ANY TIME. WE WILL INFORM YOU OF ANY CHANGES TO THIS PRIVACY STATEMENT AS REQUIRED BY LAW.