Privacy Policy

Last updated: December 2025

Our commitment to privacy

Fidelity Workplace Services LLC and its subsidiaries ("Fidelity Workplace") recognize the importance of maintaining the privacy of Your personal information. References in this Privacy Policy to "Fidelity Workplace", "we", "us", or "our" are references to the Fidelity Workplace entity that collects and processes Your personal information in connection with the current, prospective and/or past business relationship you or the firm you represent or are associated with ("Your Firm") has or had with such entity ("Business Relationship").

This Privacy Policy explains how we collect, use and disclose personal information and other information about you (hereafter "You" or "Your") in connection with the Business Relationship(s). This Privacy Policy applies to the personal information we obtain through Fidelity Workplace websites, applications, and other tools offered by Fidelity Workplace on which this Privacy Policy appears ("Digital Properties"), through use of any products and services we make available to You or Your Firm for business purposes ("Services"), and through offline business interactions with Fidelity Workplace or our service providers ("Offline Business Interactions", together with Digital Properties and Services, collectively our "Business Offerings").

This Privacy Policy applies only to personal information collected through our Business Offerings and does not apply to personal information collected about current or former Fidelity Workplace employees, job applicants, or current or former plan participants of the businesses that we serve.

Our Affiliated Companies may offer products, services and digital offerings that may have a different or additional privacy policies which may be made available to You if you choose to use those products, services or digital offerings. Some products and services available on our Digital Properties may have supplemental privacy policies that pertain to those products and services.

How we obtain personal information

As used in this Privacy Policy, "personal information" means information about an individual that is collected or maintained for business purposes and by which the individual can be identified. Please note that information by which an individual cannot be identified (for example, anonymous, de-identified, or aggregate information) is not considered personal information and therefore is not subject to this Privacy Policy.

We may collect or obtain, either directly or through our services providers, personal information and other information about You when You or Your Firm interact with our Business Offerings. The personal information we obtain varies depending on the Business Offerings you use. For example, we obtain personal information about You when You or Your Firm:

- use any of our Digital Properties, including when creating or using an account on a Digital Property;
- automatically, via technologies such as cookies and tags when you interact with our Digital Properties or electronic communications;
- provide information to us on an application or form;
- visit our offices or facilities;
- sign up for or participate in a program or event that we make available (for example, training programs, seminars, webinars, conferences, etc.);
- request information from us or about our products and services or otherwise communicate with us;
- participate in our surveys, questionnaires, research or evaluations; or
- otherwise interact with us.

We also may obtain personal information about You from other sources. For example, we may obtain personal information about You from the following sources:

- Your Firm
- Our corporate affiliates
- Publicly available sources
- Other third-party sources (for example, social networks, data brokers, etc.)
- Third parties that perform services for us or on our behalf
- Other sources with Your consent

The types of personal information we obtain

The personal information we obtain may include:

- Contact information (such as name, title, email address(es), telephone number(s), postal or other physical address(es) for You or for others (e.g., principals in Your business or billing contacts)
- Information used to create user accounts (such as username and password)
- IP address and location data (such as data derived from Your IP address, country and zip code)
- Clickstream data and other information about Your online activities on our Digital Properties (such as information about Your devices, browsing actions and usage patterns while on our Digital Properties) that we obtain through the use of cookies, pixel tags, web beacons and similar technologies as further described in the section below entitled of "Cookies and Similar Technologies")
- Information related to Your visit of our offices and facilities or Your attendance at our programs or events
- Information that we obtain from publicly available sources (such as social media channels)
- Information necessary to provide training and support in connection with Your access and use of our Digital Properties and/or Services
- Information contained in content You submit to us (such as through a "Contact Us" feature)
- Other information we obtain through our Business Offerings

How we use personal information

We may use personal information about You:

- To provide the products and services that we make available to You or Your Firm
- To communicate with You about our relationship with You or Your Firm, including, in connection with Your participation in our events, programs, surveys, questionnaires, research or evaluations
- To provide training, support and consulting services to You or Your Firm
- To respond to Your inquiries and fulfill requests from You or Your Firm
- To create and manage accounts for You or Your Firm on our Digital Properties
- To facilitate and personalize Your and Your Firms interactions and experiences with us
- To operate, evaluate and improve our business (such as by administering, developing, enhancing and improving our products and services, managing our communications and customer relationships, and performing accounting, auditing, billing, and reconciliation activities)
- To provide, administer, and enhance our Business Offerings and develop, offer and deliver other products, services, and offerings

- To conduct advertising, marketing and sales activities to You or Your Firm (including sending You or Your Firm promotional materials, performing market research, and determining and managing the effectiveness of our advertising and marketing campaigns)
- To verify Your identity and protect Your account against unauthorized use or abuse of our Digital Properties or Services
- To protect the health, safety and security of our employees
- To maintain and enhance the security of our Business Offerings, including to detect and prevent fraudulent, malicious or illegal activity, and for risk control and mitigation purposes
- To comply with laws and regulations and to fulfill other legal, judicial, or contractual requirements
- To enable integrations with third party products and platforms that You or Your Firm elect to use
- In connection with corporate business transactions, such as a merger or sale of a business

We may combine information collected from You with other sources to help us improve the accuracy of our marketing and communications as well as to help expand or tailor our interactions with You or Your Firm. This includes combining personal information we obtain through our Digital Properties with information we obtain through the provision of our Services and through Offline Business Interactions, as well as other information, for the purposes described above.

How we protect information about you

We implement and maintain physical, administrative, technical and organizational measures designed to protect personal information and we regularly adapt these controls to respond to changing requirements and advances in technology

How we share information about you with our affiliates

We may share information about You, including personal information, with various corporate affiliates that are providing services to us, such as administrative, business and data processing services. In addition, in certain situations, we may share information about You with our corporate affiliates for use in their businesses.

When we work with companies that operate globally, our stock plan services offering brings together services offered by us (Fidelity Workplace) in the U.S. and Fidelity International (FIL Limited) outside the U.S. As part of this overall offering, we treat FIL Limited and its affiliated companies as our affiliates for the purposes of sharing and processing company information.

How we share information about you with third parties

We may share certain information about You with the following third parties:

- Your Firm
- Service providers and other third parties with which we or our corporate affiliates have a business relationship
- Government agencies, other regulatory bodies and law enforcement officials
- Other organizations conducting research or performing academic or similar activities
- Other organizations as permitted or required by law (for example, for fraud prevention or to respond to a subpoena)
- Other third parties, as directed by You or Your Firm
- Third parties in connection with corporate business transactions, such as a merger or sale of a business

Our service providers are obligated to keep the personal information we share with them confidential and use it only to provide the services specified by us.

If You or Your Firm choose to use or indicate an interest in using a product or service that is offered by a third party and made available through us, we may share personal information with that third party in connection with such use or interest in that product or service.

Cookies and similar technologies

Our Digital Properties and our third-party service providers may use cookies and similar technologies ("**Cookies**") to support the operation of and maintain our Digital Properties. Cookies are small amounts of data that a website or online service exchanges with a web browser or application on a visitor's device (for example, computer, tablet, or mobile phone). Cookies help us to collect information about users of our Digital Properties, including date and time of visits, pages viewed, amount of time spent using our Digital Properties, or general information about the device used to access our Digital Properties. The cookies on our Digital Properties are also used for security purposes and to personalize Your experience, such as customizing Your screen layout.

Our Digital Properties and third-party service providers we hire may use cookies and other technologies, such as web beacons, pixel tags, or mobile device ID, in online advertising as described below. Most

browsers and mobile devices offer their own settings to manage cookies. If You use those settings to refuse or delete cookies it may negatively impact Your experience using our Digital Properties, as some features and services on our Digital Properties may not work properly. For example, You may not be able to sign in and access Your account, or we may not be able to recognize You, Your device, or Your online preferences. Depending on Your device and operating system, You may not be able to delete or block all cookies.

We may collect analytics data or use third-party analytics tools such as Google Analytics to help us measure traffic and usage trends for our digital offerings and to understand more about the demographics of our users. You can learn more about Google's practices with Google Analytics by visiting Google's privacy policy. You can also view Google's currently available opt-out options.

Advertising on Digital Properties

We advertise on our own Digital Properties, and when we do, we may use information about Your or Your Firm's relationship with us, such as the type of products and services of ours that You or Your Firm use, to tailor advertisements about Fidelity Workplace and to tailor communications about products and services offered by us or by third parties that may be of interest to You or Your Firm.

We may also use third-party service providers to help us determine which Fidelity Workplace products and services may be of interest to You or Your Firm. These service providers may use cookies and other technologies to collect for us information about Your activity on our Digital Properties. We and our service providers use such information to analyze the effectiveness of our advertising and the usage of our Digital Properties. For example, we may analyze the browsing patterns while visiting our Digital Properties and responses to content and messages shown on our Digital Properties. Such service providers may only collect and use such information for purposes specified by Fidelity Workplace and not for their own purposes.

Advertising on Third Party Digital Offerings

We also advertise our products and services on digital offerings not affiliated with Fidelity Workplace and we contract with third-party advertising companies to display these ads. These third-party advertising companies may use cookies and similar technologies to collect technical and web navigational information, such as device type, browser type, Internet protocol address, and pages visited.

Fidelity Workplace and these third-party online advertising companies may use the data collected, along with other information we have about you and You and Your Firms' relationships with Fidelity Workplace, to serve relevant ads to you. The advertisements may be relevant to Your interests, as determined by You and Your Firms' activity on Fidelity Workplace and third-party websites. These

advertisements are known as "interest-based advertisements".

You may opt-out of receiving interest-based advertisements from online advertising companies, including those used by Fidelity Workplace, by clicking on the AdChoices icon and following the opt-out instructions.

If you generally want to “opt out” of receiving online interest-based advertisements on Your internet browser from advertisers and third parties that participate in a self-regulatory programs like the Digital Advertising Alliance DAA program or the Network Advertising Initiative (NAI), please follow the instructions at WebChoices: Digital Advertising Alliance's Consumer Choice Tool for Web US (aboutads.info) and NAI Consumer Opt Out (networkadvertising.org) to place an “opt-out” cookie on your device indicating that you do not want to receive interest-based advertisements. WebChoices: Digital Advertising Alliance's Consumer Choice Tool for Web US (aboutads.info) and NAI Consumer Opt Out (networkadvertising.org) to place an “opt-out” cookie on Your device indicating that you do not want to receive interest-based advertisements. If you want to “opt out” of receiving online interest-based advertisements on mobile devices, please follow the instructions at YourAdChoices.com | AppChoices and Mobile Opt Out - NAI: Network Advertising Initiative (thenai.org).

Third Party Services

Our Digital Properties may contain links to third party websites and online services and may include embedded content that is hosted by third parties. We are not affiliated with, nor do we control, any of these third parties. This Privacy Policy does not address the privacy, security, cookie policy and settings, or other practices of the third parties that provide such websites, online services, or content, and we are not responsible for the privacy practices or the content of these other websites, online services, or content providers. If You use a link to another website or online service or view third party content (for example, an embedded video), please consult the privacy policy for that website/or online service for additional information on their privacy practices and advertising opt-out instructions.

Children's privacy

Our Business Offerings are not directed to individuals under the age of thirteen (13). We do not intentionally collect information on our Business Offerings from those we know are under thirteen, and we request that these individuals do not provide personal information through our Business Offerings.

Updates

We may change this Privacy Policy at any time. When we make changes to this Privacy Policy, we will change the "Last Updated" date specified at the beginning of this Privacy Policy. All changes shall be effective from the date the updated Privacy Policy is published, unless otherwise specifically stated in the updated Privacy Policy. We encourage You to review this Privacy Policy on a regular basis so that you will be aware of any changes to it.

Additional information for California residents

This section is provided for purposes related to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the "CPRA") and applies solely to the personal information and the Fidelity Workplace companies that are subject to the CPRA. As used in this section, "personal information" means information that meets the definition of "personal information" as set forth in the CPRA and is not otherwise excluded from the scope of the CPRA.

Your rights under the CPRA

The CPRA gives certain rights to California residents and imposes certain obligations on those businesses that are subject to the CPRA. As required by the CPRA, set forth below is a description of certain rights that California residents generally have under the CPRA. Based on Your relationship with Fidelity Workplace, some or all of the rights described below may not apply to you. As used below, a "consumer" means a resident of the State of California and a "covered business" means a business that is subject to the CPRA.

- Right to Know/Right to Access. A consumer has the right to request that a covered business that collects a consumer's personal information disclose to that consumer the categories and specific pieces of information the business has collected. A consumer also has the right to request that a covered business that collects a consumer's personal information disclose to that consumer the following:

  1. The categories of personal information it has collected about that consumer

  2. The categories of sources from which the personal information is collected

  3. The business or commercial purpose for collecting, selling or sharing (if applicable) personal information;

  4. The categories of third parties to whom the covered business discloses personal information

  5. The specific pieces of personal information that the covered business has collected about that consumer

These disclosures are not required to include any information about activity that occurred prior to

January 1, 2022. Please also note that a covered business is not required to honor more than 2 of these requests from the same consumer during any 12-month period.

- Right to Delete. A consumer has the right to request that a covered business delete any personal information that the business has collected from the consumer, subject to certain exceptions.
- Right to Correct. A consumer has the right to request that a covered business correct inaccurate personal information that a business maintains about a consumer.
- Right to Opt-Out of Sale/ Sharing. If a covered business sells or shares personal information, a consumer has the right to opt-out of the sale or sharing of their personal information by the business.
- Right to Limit Use and Disclosure of Sensitive Personal Information. If a covered business uses or discloses sensitive personal information for reasons other than those set forth in the CPRA, a consumer has the right to limit the use or disclosure of sensitive personal information by the business.
- Non-Discrimination. A consumer has the right not to receive discriminatory treatment by the covered business for the exercise of privacy rights conferred by the CPRA.

Categories of personal information we may collect about you

We may collect the following categories of personal information about you:

- Personal identifiers, such as Your name, postal address, email address, online identifier, internet protocol address, or other similar identifiers
- Information covered by California's records-destruction law (California Civil Code §1798.80), such as Your signature, telephone number, and financial account information
- Commercial information, including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- Characteristics of protected classifications under California or federal law
- Internet or other electronic network activity information, including, but not limited to, browsing history and search history while using our digital properties, and other information regarding Your interactions with our Digital Properties or our advertisements
- Audio, electronic, visual, and similar data
- Professional or employment-related information, such as job title and business contact information
- Education information

- Inferences drawn from any of the information listed above to create a profile about you, such as a profile that reflects Your preferences, characteristics, behavior, and attitudes
- Sensitive personal information such as account log-in, password or credentials allowing access to our Digital Properties

The retention periods for data elements within each category listed above vary depending on the nature of the data element and the purposes for which it is collected and used. Our retention period for the data elements within each category is set based on the following criteria: (1) the length of time that the data is needed for the purposes for which it was created or collected, (2) the length of time the data is needed for other operational or record retention purposes, (3) the length of time the data is needed in connection with our legal, compliance and regulatory requirements, for legal defense purposes and to comply with legal holds, (4) how the data is stored, (5) whether the data is needed for security purposes and fraud prevention, and (6) whether the data is needed to ensure the continuity of our products and services.

Categories of sources from which personal information is collected

Please see the section above entitled "How we obtain your personal information" for a description of the sources from which we collect Your personal information.

Why we collect personal information

Please see the section above entitled "**How we use personal information**" for a description of the business or commercial purposes for which we collect personal information, including sensitive personal information. In addition to those purposes described above, below are additional business or commercial purposes for which we collect personal information:

- To maintain the accuracy and integrity of our records
- For reporting and analytical purposes
- For quality-control measures
- For business analysis, planning, and reporting
- For effectiveness measurement

Categories of personal information disclosed for business purposes

Depending on the nature of Your interactions with us, and on the Business Offerings that we provide to You or Your Firm, we disclose to third parties for business purposes the personal information that is encompassed by one or more of the categories described in the **"Categories of personal information we may collect about you"** section above, with the categories of third parties listed in the section above entitled **"How we share information about You with third parties"**.

Selling and/or sharing of personal information

We DO NOT sell your personal information for payment or for any other compensation. However, some of the ways in which we share your personal information with third parties on our fidelityworkplace.com website may, under the CPRA, be considered to be a "sale" of personal information or "sharing" of personal information for "cross-context behavioral advertising" (as those terms are used in the CPRA).

We engage third party service providers, including marketing and advertising providers, and social media platforms (providers) to personalize your browsing experience on our fidelityworkplace.com website, to provide certain targeted advertising services for us, and to help us measure the effectiveness of this website and our online advertising. When you visit our fidelityworkplace.com website, we and our providers collect certain information about your activity on the website, including cookies, tags, and similar data stored on or collected from your browser or device. In some cases, our providers may combine this information collected on this website with information about your activity on other, unaffiliated websites or social media platforms to deliver our ads to you when you are visiting other websites or platforms. This sharing of your information with certain third parties via cookies and similar methods, and our providers' use of certain cookies, may be considered to be a "sale" of personal information or "sharing" of personal information for "cross-context behavioral advertising" under the CPRA. We DO NOT participate in joint marketing with unaffiliated third parties.

California residents covered by the CPRA have the right to opt out of this "sale" or "sharing" of personal information. When we engage in these activities on our fidelityworkplace.com website and are covered by the CPRA, if we determine that you are visiting the website from a location in California, you will see a "Do Not Sell or Share my Personal Information" link on the footer of the website's homepage. To opt out of this sale or sharing of your personal information, please click on the link and follow the prompts.

Note that Fidelity Workplace permits all visitors to certain portions of our fidelityworkplace.com website (for example, the homepage at www.fidelityworkplace.com) to automatically exercise their right to opt-out of this sale or sharing of this personal information through the use of the Global Privacy Control (GPC) signal without having to make individualized opt-out requests. If you've enabled the GPC signal in your browser, we will honor your request to opt-out of this sale or sharing of personal information as communicated via the GPC signal. These opt-outs (whether via the toggle above or via the GPC signal) are a setting that is specific to the device or browser you're using. You'll need to opt out again if you visit our fidelityworkplace.com website from a different device or browser, change your

browser settings, or clear your cookies.

In the 12 months preceding the date of this Notice, we "sold" and/or "shared" personal information for "cross-context behavioral advertising" on our fidelityworkplace.com website, with respect to California residents covered by the CPRA. We do not knowingly "sell" or "share" for "cross-context behavioral advertising" personal information of minors under 16 years of age.

CPRA exemptions

Please note that certain types of personal information collected or maintained by a covered business are exempt from the CPRA. For example, a covered business has limited obligations, or in some cases, no obligations, under the CPRA with regard to the following types of personal information:

- Personal information collected, processed, sold, or disclosed pursuant to the federal Gramm-Leach-Bliley Act (Public Law 106-102) and implementing regulations, or pursuant to the California Financial Information Privacy Act (Division 1.4 [commencing with Section 4050] of the California Financial Code)
- Medical information governed by the Confidentiality of Medical Information Act or protected health information that is collected by a covered entity or business associate pursuant to the Health Insurance Portability and Accountability Act of 1996

In addition, some businesses are not subject to the CPRA, such as:

- A business that does not do business in the State of California
- A business that is not organized or operated for the profit of financial benefit of its shareholders or other owners
- A business that does not determine the purposes and means of the processing of consumers' personal information
- A business that has annual gross revenue of $25,000,000 or less

Furthermore, under the CPRA, there are a number of situations where a covered business under the CPRA may refuse to honor a CPRA request to delete a consumer's personal information and is allowed to continue to maintain the personal information. Some examples include situations where retention of the personal information is reasonably necessary to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by the consumer or reasonably anticipated within the context of the covered business's ongoing business relationship with the consumer, or otherwise perform a contract between the Fidelity company and the consumer
- Help to ensure security and integrity to the extent the use of the personal information is reasonably necessary and proportionate for those purposes
- Debugging to identify and repair errors that impair existing intended functionality
- Exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided by law
- To enable solely internal uses that are reasonably aligned with consumer expectations based on the consumer's relationship with the business and compatible with the context in which the consumer provided the information
- Comply with a legal obligation

Please note that the description of the CPRA set forth in this Privacy Policy is a summary of only certain aspects of the CPRA and is not and should not be considered a complete description of the CPRA. In addition to what is described above, the CPRA includes other exemptions that apply to particular types of personal information and particular businesses, as well as additional situations where a covered business is not required to honor a consumer's request to delete the consumer's personal information.

Submitting a CPRA request

If You wish to submit a CPRA request to any of the Fidelity Workplace companies, You may initiate Your request through one of the options provided on our California Privacy Rights Request Page. Before submitting Your request, please ensure You have reviewed all the CPRA exemptions, including those described above under the section entitled "CPRA Exemptions".

You should generally expect to receive a response within 45 days of the date we receive Your request. However, in some instances, we may require an additional 45 days to process Your request in which case we will notify You and explain why the extension is necessary.

We will need to verify Your identity before we can process Your request. Through the request process, we will make You aware of any information that You will need to provide to us to process Your request. You may have to confirm that You are a California resident and verify Your identity or the identities of those authorized to submit requests on Your behalf. Additionally, the information You provide will be used to help verify Your identity.

To understand how You can designate an authorized agent with the ability to make a request under the CPRA on Your behalf, please refer to our California Privacy Rights Request page.

During calendar year 2025, Fidelity companies covered by this privacy policy received 18 CCPA requests for disclosure of personal information (request to know), 27 CCPA requests for deletion of personal information (request to delete), 3 requests for the correction of personal information (right to correct) and 6 requests for accessing personal information (request to access). Fidelity companies responded to each of these requests in an average of 7 days.

Your rights under the European Union's General Data Protection Regulation and the United Kingdom's Data Protection Act 2018

You or Your firm, may have obligations under international privacy regulations. As applicable, please refer to the NetBenefits Privacy Policy for individuals residing outside the U.S.

For authorized users and/or controller obligations, please contact us through Plan Sponsor Webstation (PSW) indicating the reason for the inquiry.

Please note, PSW provides a portal to:

- access certain personal data that we hold
- modify/correct any information You have shared with us directly

How long do we keep your personal data?
We retain your data for as long as necessary to meet our regulatory and contractual requirements.

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