



# Setting up digital contact information

Communications with your employees should be handled in the way they prefer and the way that drives the best results for your plans.

It's important to take advantage of the benefits of electronic communications, and to understand the Department of Labor (DOL) rules that dictate "safe harbor" best practices regarding how and where electronic communications can be used.

Furthermore, by providing digital contact information additional account security can be enabled such as two-factor authentication on NetBenefits® and alerts for high-risk transactions.

Contact your Fidelity Representative to decide how best to take advantage of a more electronic experience and learn more about how Fidelity can improve employee performance through email regardless of its safe-harbor status. Follow this guide to update your employees' work and home email addresses and phone numbers and designate how they can be used.



# Fidelity's preferred method for participant communications is electronic delivery

It's important to understand the DoL's rules that dictate safe harbor and when electronic delivery is allowed

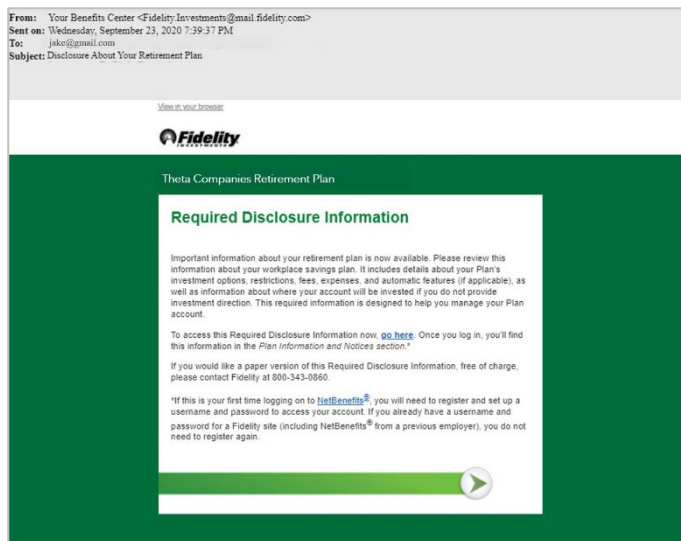
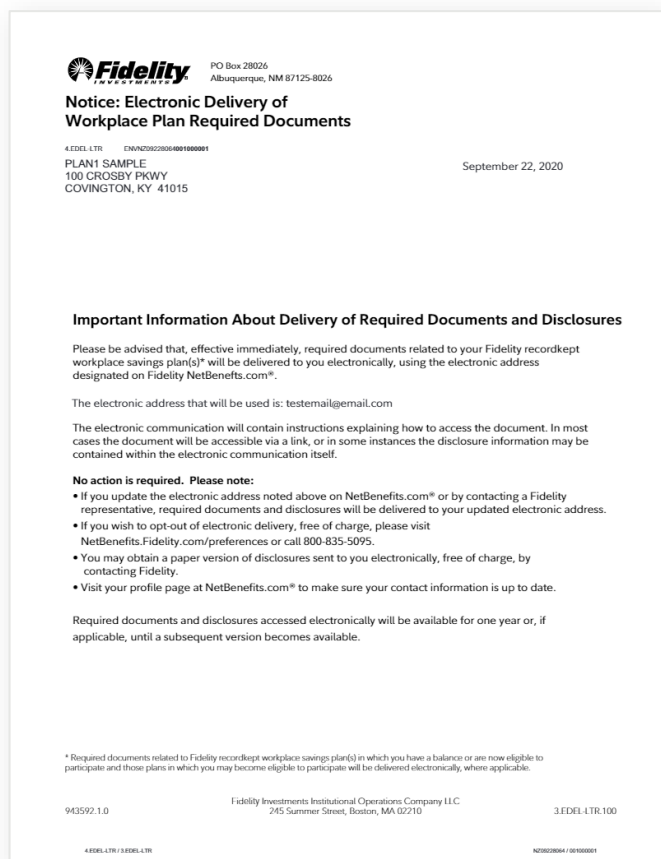
## 2020 eDelivery default safe harbor

The 2020 eDelivery Default safe harbor applies when delivering required plan documents to a personal email address. The Department of Labor (DOL) issued a final regulation in May 2020 creating two new, optional alternative safe harbors for satisfying ERISA's disclosure delivery requirements for retirement plans. The new safe harbor permits two methods for electronic delivery (eDelivery).

**1 Notice and access on a website** After sending an initial notice in paper, covered documents can be posted on a website or other electronic repository, such as a mobile application, if notification of internet availability is furnished to the covered individuals at the identified electronic address.

**2 Direct delivery by email** After sending an initial notice in paper, covered documents can be sent directly by email to covered individuals either via an attachment or in the content. Other electronic addresses, such as smart phones, are excluded.

A new participant personal email address provided by the Plan Sponsor will trigger an initial printed notice to be sent from Fidelity, after which the email address will be available for eDelivery of required plan documents.



Participants may change their eDelivery preferences at any time on the NetBenefits Profile page. Participants who opt-out of eDelivery will receive printed versions of legally required plan documents.

# 2002 eDelivery safe harbor rules still apply



## Workplace safe harbor

The **workplace employee safe harbor** applies only to a company provided email address and is a determination made by the Plan Sponsor. Generally, it is an indication that the recipient at that address:

- Can effectively access documents in electronic form at any location where reasonably expected to perform duties as employee; and
- Has access to the employer's electronic information system as an integral part of those duties.

A safe harbor workplace email will be used to deliver plan related communications. If the workplace email is not identified as meeting the safe harbor requirements, it will only be used for non-regulatory communications



## Participant safe harbor

The **participant consent safe harbor** applies when delivering required plan documents to an email address other than a workplace safe harbor address. In this case, a participant must agree to the electronic delivery of regulatory plan documents. Fidelity refers to this participant agreement as "eDelivery consent".

A personal email with eDelivery consent will be used to deliver plan related communications and may also be used for non-regulatory communications based on the participant's preference selections on NetBenefits.

### Consent collection criteria

If the Plan Sponsor or Prior Record Keeper has already collected eDelivery consent directly from participants, Fidelity can accept this indicator on files, provided that the initial collection of such met all of the following criteria:

Participants consented in a manner that reasonably demonstrates the ability to access information through such electronic medium;

Participants provided an address for the receipt of the electronically furnished documents;

Participants were informed of any hardware and software requirements for accessing and retaining the documents;

Participants were provided with information on the types of documents to which the consent would apply;

Participants were informed of their right to withdraw their consent at any time without charge, and procedures for doing so;

Participants were informed of their right to request paper versions of documents, procedures to do so, and whether the paper version will be provided free of charge.

Participant eDelivery consent received from the Plan Sponsor will be treated the same as eDelivery consent received directly from the participant. By providing participant eDelivery consent, you are confirming that you have obtained the participant's affirmative consent to receive required documents electronically consistent with 29 C.F.R. §2520.104b-1(c), and are directing Fidelity to enable electronic delivery of required documents for the participant.

If a participant has already logged onto NetBenefits® and updated their eDelivery consent, the value provided via the feed will be ignored. Participants may change their eDelivery preferences at any time on the NetBenefits Profile page.

### Participants can also indicate their electronic delivery preferences on NetBenefits

Yes, I would like to receive my documents and notifications electronically (eDelivery).

#### Important Disclosure

Print

By checking the box above and clicking on Continue, you consent to receive and view plan communications electronically, instead of by U.S. Mail, for any of your

# Sending information to support electronic delivery and account security



## Accepted data

### Phone

Fidelity can accept personal phone numbers collected by the employer.

Phone numbers will be used for account security (e.g. two-factor authentication and real-time alerts).

### Email

Fidelity can accept both an employer-provided workplace email address and a personal email address for each participant.

Email addresses can be sent alone or with the additional safe harbor/consent indicators as outlined on the previous page. Note that an email address that does not satisfy one of these safe harbors will not be used for regulatory mailings.



## How we apply the data you provide

### Account Security



#### Two Factor Authentication

requires a unique one time pass code to be entered to perform certain transactions. This second layer of verification helps prevent unauthorized access to an account, even if a fraudster has obtained a login ID and password.

#### Real Time Alerts

notify participants via SMS text of certain types of account activity which could potentially be unauthorized, such as requesting a loan or withdrawal. Participants who do not wish to receive text message can 'reply STOP to opt out' of future messaging.

### Participant and communication specific delivery channel



#### Available participant email addresses

Personal email, employer provided personal email, work email



#### Communication delivery hierarchy

Personal email, work email, print



#### Communication type

Regulatory, transactional, educational



#### eDelivery safe harbors and participant preferences

Participant consent, participant initial notice, work safe harbor

\*Personal email address/phone number provided by the employer will not overwrite any personal email address/phone number provided by the participant

The available data for each of these factors is considered for the specific participant and message at the time of delivery. Messages are delivered to the first address in the hierarchy which satisfies all the criteria.

# How to send digital contact information

Employer-provided email addresses and phone numbers can be transmitted to Fidelity via Electronic Data Transmission (EDT) and through Plan Sponsor WebStation (PSW).



## Option 1: Electronic Data Transmission (EDT)

Record specification for updating **numerous** participants at once

| Fidelity Investments<br>Share the Vision |                 |                   |       | E-Delivery<br>E-MAIL ADDRESS RECORD |                                |                      |
|--|-----------------|-------------------|-------|-------------------------------------|--------------------------------|----------------------|
| FFI ID NO.                               | NUMBER OF BYTES | POSITIONS FROM TO | VALUE | FIELD NAME                          | DATA TYPE                      |                      |
| 1  | 5               | 1                 | ####  | PLAN NUMBER                         | B(5) DC                        |                      |
| 2  | 4               | 6                 | 9     | SAVING GROUP ID                     | X(4) DC                        |                      |
| 3  | 3               | 10                | 12    | FILLER                              | X(3) NA                        |                      |
| 4  | 11              | 13                | 23    | 99 99 9999                          | SOCIAL SECURITY NUMBER         | X(10) ID3            |
| 5  | 1               | 24                | 25    | E or S924                           | EMPLOYEE ID                    | X(1) RETAIL USE ONLY |
| 6  | 3               | 26                | 28    | SPACES                              | FILLER                         | X(3) NA              |
| 7  | 2               | 30                | 31    | CA                                  | RECORD IDENTIFIER              | X(2) ID3             |
| 8  | 1               | 32                | 32    | A, L, S                             | E-MAIL ADDRESS STATUS CODE     | X(1) ID3             |
| 9  | 2               | 33                | 34    | CLPR                                | E-MAIL TYPE CODE               | X(2) ID3             |
| 10                                       | 2               | 36                | 36    |                                     | RESERVED FOR FUTURE USE        | X(2) ID3             |
| 11                                       | 1               | 37                | 37    | TEWJ                                | E-MAIL SECOND SURVEILLANCE NBR | X(1) ID3             |
| 12                                       | 36              | 38                | 73    |                                     | E-MAIL ADDRESS TEXT            | X(36) ID3            |
| 13                                       | 1               | 74                | 74    |                                     | NON-SAFE HARBOR INDICATOR      | X(1) ID3             |
| 14                                       | 7               | 75                | 81    | SPACES                              | FILLER                         | X(7) ID3             |

To ensure Fidelity always has the most up-to-date information, consider transmitting email and phone via EDT. For more information on how to submit digital contact information via your EDT record specification, contact your Fidelity Representative.

- This update method is available for all digital contact information. Data requirements will vary based on the type of contact information you are sending.
- These requirements are included in the Email (EA) and Phone (PH) record specifications.
- Please contact your Fidelity Representative for more information or to initiate a change request to your ongoing data feed.



## Option 2: Manual PSW® Update

For **individual** participant updates

Based on user access, a user may be able to add, remove, or change an individual employee's digital contact information.

- This update method is available for email addresses and phone numbers. Not available for eDelivery consent.
- Plan Sponsor must leave the "Do not send legally required communications to this email address" box unchecked in order for the email address to be considered "safe harbor" and for it to be permissible to send legally required communications.
- If it has been determined that an email address does not meet the criteria for "safe harbor" email delivery, the "Do not send legally required communications to this email address" box should be checked. Participants may have other communications delivered to this address, however.

**Unchecked = safe harbor;**  
**checked ✓ = non-safe harbor.**

**Must be unchecked for work email addresses only.**  
**This does not apply to home email addresses.**



## Option 3: PSW Upload

For updating **numerous** participants at once

Based on user access, a PSW Upload may be completed to add, remove, or change the employees' digital contact information.

[Download PSW upload template](#)

- This update method is available for all digital contact information.
- ALL fields** must be included in the upload in order for it to be successful. Refer to the "What are the data elements needed for hours, email or phone file submissions?" help link on the PSW upload screen for a list of required fields.
- Participants no longer employed who have an employer provided work email address on file should have that email status updated to "inactive".

# Digital contact information experience on NetBenefits®

Digital contact information provided by you can be viewed by your employees on the Profile page on NetBenefits®



## Personal and contact information

Here employees can confirm and update their contact preferences for the email address and phone number they provided, and view the contact information their employer has provided. A link to specific instructions on changing employer-provided information is also available.

Email addresses are used for sending plan and service related communications, and in the two-factor authentication process for account security.

Phone numbers are used in the two-factor authentication and transaction alert process for account security, and when needed to follow up on participant initiated actions (e.g. an error or omission on a web initiated transaction).

Fidelity does not sell contact information to third parties or share the information for non plan related or agreed upon product offerings. Go to [Netbenefits.com](https://netbenefits.com/privacy) and click on the [Privacy](#) link to view our full privacy policy.

The screenshot shows the 'Profile' page on Fidelity NetBenefits. It displays 'Primary contact information' for 'Jake Walter' with email 'j\*\*\*\*@gmail.com' and phone '800xxx5555'. Below this, it shows 'Contact information from you' with two email addresses and one phone number, each with 'Make primary' and 'Delete' options. At the bottom, it shows 'Contact information from your employer(s)' for 'THETA COMPANIES', including personal information, address, and email.



## Preferences

Employees can check and change their eDelivery preferences for required communications such as Summary Plan Descriptions, and for service and educational communications for things like transaction confirmations and information on online guidance tools available to them.

Employees are also informed here that in some instances, your plan's delivery rules may result in receiving communications by means other than their preferred delivery method.

Once an employee has made an active selection on NetBenefits®, e-delivery consent can no longer be updated by the employer.

The screenshot shows the 'Communication' preferences section on the Fidelity NetBenefits Profile page. It includes sections for 'Required communications', 'Where we'll contact you', 'Statement notifications', 'Tax form notifications', 'Required disclosures', 'Service and educational communications', 'Confirmation of one-time transactions', 'Confirmation of recurring transactions', 'Service notifications', 'Savings and retirement education', and 'Health and insurance education'. Each section has radio buttons for 'Yes' or 'No' and a 'View' link for more information.