

Privacy Promise

Systematized Benefits Administrators, Inc. (“SBA”), takes your privacy very seriously. We share a commitment to protect your privacy and the confidentiality of your personal and financial information.

As providers of products and services that involve compiling personal – and sometimes, sensitive – information, protecting the confidentiality of that information has been, and will continue to be, a top priority throughout SBA and its affiliated companies. We believe that you should know about the information we collect, the measures we take to safeguard it, and the situations in which we might share information with select business partners. This notice explains how we handle – and protect – the personal information we collect.

The information we collect and the extent to which we use it will vary depending on the product or service involved. In fact, in certain cases, we may not collect or share some of the types of information noted later on in this article. For example, we may have an agreement with a third party that limits the sharing of information about its customers with any other company, even if that company is an SBA affiliate. These agreements continue to be honored.

Our privacy promise derives from basic principles of trust, ethics and integrity:

1. We collect only the customer information necessary to consistently deliver responsive products and services.

We collect information that helps serve your financial needs; provide high standards of customer service; develop and offer new products or services for our customers and potential customers; and fulfill legal and regulatory requirements. The information collected generally varies depending on the products or services you request and may include:

- Information provided in personal interviews or on applications and related forms – for example, name, address, Social Security number, and annual income.
- Responses from your employer, benefit plan sponsor, or association regarding any group products we may provide – for example, name, age, address and Social Security number.
- Third-party reports, such as consumer credit history, motor vehicle records, demographic and/or medical information, if relevant to your products or services.
- Information about your relationships with us, such as products or services purchased and account balances (if applicable), which we may obtain in writing during telephone or Internet transactions or from data gathering software used when you are accessing our web sites.

2. We maintain safeguards to ensure information security.

We have implemented security standards and processes – including physical, electronic and procedural safeguards – to ensure that access to customer information is limited to employees, registered representatives or agents who may need it to do their jobs. They are required to respect the confidentiality of all customer information.

3. We limit how, and with whom, we share customer information.

First and foremost, we do not sell lists of our customers, nor do we disclose customer information to marketing companies outside SBA, with the exception of companies we may hire to provide specific services for us, as described below.

Under no circumstances do we share medical information for marketing purposes.

We will share customer information only for the following reasons:

When it is necessary to disclose information to third parties in order to effect, administer or enforce a transaction that you request or authorize – for example, when we provide information we collect to a mutual fund company from which you wish to purchase shares.

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We may be required by law or regulation to disclose information to third parties – for example, in response to a subpoena, to prevent fraud, and to comply with rules of, or inquiries from, industry regulators.

In some cases, we may share information we collect – for example, name, address, age, and Social Security number – with affiliated businesses. These may include our securities broker-dealers or our insurance companies and agencies to process or service a transaction you have requested, to facilitate enhanced customer services, or to inform you of financial products or services you may find useful. In a few cases, an affiliated business may have a privacy policy that differs from the one stated in this notice. If that is the case, you will receive a separate privacy notice from that business if you are a customer. The agent or registered representative with whom you work to obtain financial products and services may use the personal information about you in his or her own files to advise you of other products or to help you with your overall financial strategy.

We will not share information about you with another SBA affiliate that may be used to make insurance underwriting or lending decisions about you, unless you so direct us or unless we tell you beforehand and give you a chance to say no.

Furthermore, as permitted by federal and state laws, we may share or exchange information with companies engaged to work with us, such as:

- Third-party administrators and vendors hired to effect, administer or enforce a transaction that you request or authorize; to develop or maintain software; or to perform marketing research.
- Financial services entities, such as banks, credit unions, credit union service corporations, thrifts, thrift service organizations, insurance companies, or securities broker-dealers, with which we have joint marketing agreements. The information we may share is described in section 1.

Other than what is described, we won't share information about you with third parties to market products to you, unless we tell you about it first, and give you a chance to say no.

We uphold these privacy principles throughout SBA and its affiliated companies and with our business partners. Companies with which we share customer information are required to maintain the confidentiality of that information.

We will reaffirm this policy annually in writing, as long as you maintain an ongoing relationship with us. While this policy may change from time to time, you can always review our current policy online at www.pers.state.ms.us by clicking on “MS Deferred Compensation Plan.”

In this notice of our Privacy Promise, the words “you” and “customer” are used to mean any individual who obtains or has obtained a financial product or service from SBA that is to be used primarily for personal, family or household purposes.

700 North State Street
Suite 105
Jackson, Mississippi 39202
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