



California Privacy Notice

Effective as of September 1, 2024

Retirement Income Solutions, Inc. (“RIS”, “we”, “us” or “our”) is required under the California Consumer Privacy Act of 2018 (“CCPA”), at Cal. Civil Code § 1798.100 et seq., to provide California residents (“you” and “your”) with certain information about how we collect, use and share personal information, and about the rights and choices that may be available to under the CCPA, with respect to personal information. (For purposes of this California Privacy Notice, “personal information” has the meaning given in the CCPA, as “information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.”)

1. Personal Information that We Collect, Use and Share

The chart below summarizes how we collect, use and share personal information by reference to the statutory categories specified in the CCPA, and describes our practices during the 12 months preceding the effective date of this Privacy Notice.

<u>Statutory Category</u>	<u>Information Collected</u>	<u>Sources of Information</u>	<u>Purposes of Collection</u>	<u>Disclosures to Third Parties</u>
Identifiers (such as name, email, address, phone number, government ID numbers)	<ul style="list-style-type: none"> • Name • Contact information • ID information • Online registration information 	<ul style="list-style-type: none"> • Submitted by you • Affiliates and business partners • Third parties • Public sources • Automated online or device collection 	<ul style="list-style-type: none"> • Provide and develop our services • Communications • Marketing • Compliance and legal obligations • Internal business management 	<ul style="list-style-type: none"> • Service providers • Affiliates and business partners • Professional advisors
Financial, medical or insurance information (such as payment cards, financial account numbers)	<ul style="list-style-type: none"> • Financial account information 	<ul style="list-style-type: none"> • Submitted by you • Affiliates and business partners 	<ul style="list-style-type: none"> • Provide and develop our services • Compliance and legal obligations • Internal business management 	<ul style="list-style-type: none"> • Service providers • Affiliates and business partners
Characteristics of protected classifications under California or federal law (such as age, gender, race, citizenship)	<ul style="list-style-type: none"> • Citizenship, and birth date are requested in the account opening process • Except for above, we generally do not specifically request this information, but such characteristics may be incidentally revealed by personal information collected in our usual business operations 	<ul style="list-style-type: none"> • Submitted by you • Affiliates and business partners • Third parties • Public sources 	<ul style="list-style-type: none"> • Provide and develop our services • Internal business management • Compliance and legal obligations 	<ul style="list-style-type: none"> • Service providers • Affiliates and business partners • Professional advisors



<u>Statutory Category</u>	<u>Information Collected</u>	<u>Sources of Information</u>	<u>Purposes of Collection</u>	<u>Disclosures to Third Parties</u>
Commercial activity and information (such as transaction history)	<ul style="list-style-type: none"> • Transaction and commercial activity conducted via our services 	<ul style="list-style-type: none"> • Submitted by you • Affiliates and business partners • Third parties • Automated online or device collection 	<ul style="list-style-type: none"> • Provide and develop our services • Communications • Marketing • Compliance and legal obligations • Internal business management 	<ul style="list-style-type: none"> • Service providers • Affiliates and business partners • Professional advisors
Internet or network activity and information (such as usage and browsing data)	<ul style="list-style-type: none"> • Online activity data • Device data 	<ul style="list-style-type: none"> • Automated online or device collection 	<ul style="list-style-type: none"> • Provide and develop our services • Marketing • Compliance and legal obligations • Internal business management 	<ul style="list-style-type: none"> • Service providers • Affiliates and business partners
Professional or employment information	<ul style="list-style-type: none"> • Information about current or former employment and professional roles 	<ul style="list-style-type: none"> • Submitted by you • Affiliates and business partners • Third parties • Public sources 	<ul style="list-style-type: none"> • Provide and develop our services • Marketing • Internal business management • Compliance and legal obligations 	<ul style="list-style-type: none"> • Service providers • Affiliates and business partners • Professional advisors
Geolocation data ¹	Not collected	N/A	N/A	N/A
Sensory information (such as photos, other recorded electronic information)	Not collected	N/A	N/A	N/A
Inferences drawn from any personal information collected	Not collected	N/A	N/A	N/A

Other disclosures to third parties. In addition to the disclosures described above, we may disclose your personal information as necessary in the following circumstances:

- To fulfill our legal obligations, or to defend our or others' legal rights.
- For purposes of compliance, fraud prevention and safety of individuals or property.

¹ In this context, geolocation data refers to highly specific location data in time, and it does not refer to an address or general location information, such as may be derived from an IP address.



In the event of a business transaction or potential business transaction involving RIS, such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.

No sales of personal information. We do not sell any personal information, as “selling” is defined in the CCPA. In addition, it is our policy not to sell, rent or exchange your personal information with any third parties for those third parties’ direct marketing purposes.

2. Your California Privacy Rights

As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your personal information during the past 12 months:
 - The categories of personal information that we have collected.
 - The categories of sources from which we collected personal information.
 - The business or commercial purpose for collecting and/or selling personal information.
 - The categories of third parties with whom we share personal information.
 - Whether we have disclosed your personal information for a business purpose, and if so, the categories of personal information received by each category of third party recipient.
 - Whether we’ve sold your personal information, and if so, the categories of personal information received by each category of third party recipient.
- **Access.** You can request a copy of the personal information that we have collected about you during the past 12 months.
- **Deletion.** You can request that we delete the personal information that we have collected from you.
- **Opt-Out.** You can direct a business that sells your personal information to cease selling your personal information.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination. This means that we will not penalize you for exercising your rights by taking actions such as denying you services; increasing the price/rate of services; decreasing service quality; or suggesting that we may penalize you as described above for exercising your rights.

3. How to Exercise Your Rights

If you are a California resident, you may make requests to exercise the privacy rights described above as follows:

- By phone at 734-769-7727 or 800-360-1953
- By email at ris@risadvisory.com

We will only respond to verifiable consumer requests, and we will need to confirm your identity to process and respond to requests to exercise privacy rights. As a part of this process, government identification or other information may be required. (If we collect additional personal information from you to verify a request, that personal information will only be used for verification.) Consistent with California law, you may designate an authorized agent to make a request on your behalf, and in that case we will need to appropriately confirm that the agent has been validly authorized, for example by confirming the authorization with you or by requiring a power of attorney. We also reserve the right to confirm your current California residency.

Please understand that we cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it. Please also understand that we are not obligated to provide you with a copy of personal information more than twice in a 12-month period.



4. Changes to this Privacy Notice

We may modify this California Privacy Notice at any time to reflect changes in our use of personal information. We will take appropriate steps to notify you of material changes to this Privacy Notice, which may include by email or notification through our services, or by updating the date of this Privacy Notice and posting it to our website.

5. How to Contact Us

Please direct any questions or comments about this Privacy Notice or our privacy practices to ris@risadvisory.com or to Retirement Income Solutions, Inc. 2301 Platt Road, Suite 300 Ann Arbor, Michigan 48104.