

**PARS Portal Privacy Policy**  
**Effective Date: February 27, 2018**

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**A. Privacy Statement**

Your privacy is valued and respected at Public Agency Retirement Services (“*we*”, “*our*”, “*us*,” or “*PARS*”). This Privacy Policy (“*Privacy Policy*”) describes the types of information, including Personally Identifiable Information, that we gather from you when you use the <https://myaccount.pars.org/> website (the “*Portal*”), as well as your choices regarding use and disclosure of your (“*you*” or “*your*”) Personally Identifiable Information. By accessing or using our Portal, you consent to the policies and practices described in this Privacy Policy, as modified from time to time by us in our sole discretion. As used in this Privacy Policy, the term “*Personally Identifiable Information*” means information that identifies you personally, alone or in combination with other information available to us.

**By accessing our Portal, you agree to be bound by this Privacy Policy. If you do not agree to the terms of this Privacy Policy or our Terms of Service, do not use our Portal. Each time you use our Portal, the then-current version of the Privacy Policy will apply. Accordingly, whenever you use our Portal, you should check the date of this Privacy Policy (which appears at the top) and review any changes since the last version. This Privacy Policy is applicable to all users of our Portal.**

Further, you acknowledge that this Privacy Policy is part of our Terms of Service available at <https://myaccount.pars.org>, which is incorporated by reference, and by accessing or using our Portal, you agree to be bound by the Terms of Service (“*Terms of Service*”). If you do not agree to our Terms of Service, do not access or use our Portal. If you have any questions about our privacy practices, please refer to the end of this Privacy Policy for information on how to contact us.

## **B. Information Collected by PARS**

When you use our Portal, PARS collects information (i) that you knowingly and voluntarily provide when you use our Portal (such as through forms or profile screens) including registration/account setup information, and (ii) that we are able to collect from your web browser, cookies, and/or other similar technologies.

### **1. Information that you Knowingly and Willingly Provide**

PARS collects the information that you knowingly and voluntarily provide when you use our Portal (such as through web forms or profile screens), including registration/account setup information, and profile details. We primarily use this information to help you access, and make use of, the Portal. You can choose not to provide us with certain Personally Identifiable Information, but then you may not be able to take advantage of our Portal or other available features we offer. The information that we collect and use may include the following kinds of Personally Identifiable Information:

- First and Last Name
- Email Address
- Postal Address
- Telephone Number
- Login name, screen name, nick name, handle or any other identifier that permits the physical or online contacting of a specific individual
- Date of Birth
- Social Security Number

### **2. Non-Personally Identifiable Information**

PARS collects information that is sent to us automatically by your web browser. PARS may use this information to generate aggregate statistics about visitors to our Portal. This information typically includes details about your:

- IP Address
- Browser Type
- Operating System
- Local Time Zone
- Date and Time of Each Visitor Request (e.g. web pages selected and time spent on each page)
- Device Type (e.g. desktop, laptop, tablet, phone, etc.)

PARS may use non-Personally Identifiable Information for various business purposes such as providing customer Portal, fraud prevention, market research, and improving our Portal. The information we receive depends on the settings on your browser. Please check your browser if you want to learn what information your browser sends or how to change your settings.

**Aggregate Information.** We may aggregate and/or anonymize all information that we collect from you, including Personally Identifiable Information. This may be done for the purpose of market research on our services.

### 3. Information Collected by Cookies, Web Beacons and Other Technologies

PARS may obtain information about you by installing "cookies" on your computer's hard drive. We use cookies to collect statistical information about the ways visitors use our Portal including which pages they visit, which links they use, and how long they stay on each page. PARS also may use cookies to create a database of your previous choices and preferences, saving you time and effort. If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. If you limit or disable the use of cookies when you visit PARS, you may be unable to use the full functionality of our Portal.

#### **C. PARS' Do Not Track Policy**

PARS responds to a web browser's "do not track" signals.

#### **D. How Is Your Personally Identifiable Information Used?**

We may use Personally Identifiable Information we collect about you on its own or combine it with other information we have about you to:

- To create and manage user accounts and/or profiles through registration and account maintenance
- Perform internal operations, such as tracking and improving the effectiveness of the Portal
- Provide support
- Resolve disputes between users and/or a user and PARS, as set forth in our Terms of Service
- Use the location of your mobile device to prevent fraud or deliver other location-based services that you may request
- Conduct surveys and research
- Receive feedback
- Conduct audits
- Provide information to our suppliers or business partners
- Provide information to our representatives and/or advisors, such as our attorneys, accountants, and others to help us comply with legal, accounting, or security requirements
- Comply with legal requirements, such as in response to a subpoena or similar investigative demand

We may also disclose your Personally Identifiable Information as otherwise set forth in this Privacy Policy, as permitted by law, or with your consent.

#### **E. Who Can Access the Information We Collect?**

PARS may disclose your Personally Identifiable Information in the following instances:

**Agents.** We employ other companies and individuals to perform functions on our behalf. Examples of such functions include fulfilling orders, delivering packages, sending postal mail and e-mail, removing repetitive information from customer lists, analyzing data, providing technical support, providing marketing assistance, providing search results and links (including paid listings and links), and providing customer service. We share our users' Personally Identifiable Information with these agents as we deem necessary for such third parties to perform their functions.

**Employees.** Only authorized employees have access to your Personally Identifiable Information.

**Affiliates.** When you are asked for information while on our Portal, you are sharing that information with PARS, and our various affiliates and sister companies, unless specifically stated otherwise. As a result of this sharing, you may receive communications from any of our affiliates.

**Authorized Business Partners.** These include agents, contractors, vendors, licensors, resellers, system integrators, etc. We, our affiliates, and our business partners may share this Personally Identifiable Information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve our products, Portal, content, and advertising.

**To Comply with Legal Process, Protect PARS, or Enforce our Rights.** We may release your Personally Identifiable Information when it is necessary to (i) conform to legal requirements or comply with legal process; (ii) enforce or apply our conditions of use and other agreements (iii) protect the rights, safety or property of PARS, our affiliates, service providers, our users or the public, or (iv) prevent a crime or protect national security (including exchanging information with other companies and organizations for fraud protection and credit risk reduction).

**As Part of a Merger or Sale of Business.** We may disclose your Personally Identifiable Information in connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

#### **F. Selling of Personal Identifiable Information**

We will not sell your Personally Identifiable Information to third parties for their use without your consent.

#### **G. Minors and Children Privacy**

Our Portal is not directed to children under the age of 13, if you are not 13 years or older, do not use our Portal. We do not knowingly collect Personally Identifiable Information from children under the age of 13. If we learn that Personally Identifiable Information of persons less than 13

years-of-age has been collected through our Portal, we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child or a minor under the age of 13 has posted, submitted or otherwise communicated Personally Identifiable Information to our Portal without your consent, then you may alert us at: [plansupport@pars.org](mailto:plansupport@pars.org) so that we may take appropriate action to remove the minor's Personally Identifiable Information from our systems.

## **H. Links to Third Party Services**

Our Portal may contain links to third party websites, applications and services not operated by us. These links are provided as a service and do not imply any endorsement by PARS of the activities or content of these sites, applications or services nor any association with their operators. PARS is not responsible for the privacy policies or practices of any third party including websites or services directly linked to our Portal. We encourage you to review the privacy policies of any third party site that you link from our Portal.

## **I. Security, Storage, and Retention**

### **1. Security**

We take reasonable technical and organizational precautions to protect the confidentiality, security and integrity of your Personally Identifiable Information. Although we use security measures to help protect your Personally Identifiable Information against loss, misuse or unauthorized disclosure, we cannot guarantee the security of information transmitted to us over the Internet. While we strive to use commercially acceptable means to protect your Personally Identifiable Information, there is no guarantee that information may not be accessed, disclosed, altered or destroyed.

### **2. Storage**

The Personally Identifiable Information that you provide to us is generally stored on servers located in the United States. If you are located in another jurisdiction, you should be aware that once your Personally Identifiable Information is submitted through our Portal, it will be transferred to our servers in the United States and that the United States currently does not have uniform data protection laws in place.

### **3. Retention**

We will retain your information for as long as your account is active or as needed to provide you with our Portal. If you wish to cancel your user account or request that we no longer use your information to provide you access to our Portal, contact us at: [plansupport@pars.org](mailto:plansupport@pars.org). We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **J. International Users**

We are headquartered in the United States. Your Personally Identifiable Information may be accessed by us or transferred to us in the United States or to our affiliates, partners, merchants, or service providers who are located worldwide. If you are visiting our Portal from outside the United

States, be aware that your information may be transferred to, stored, and processed in the United States where our servers are located, and our central database is operated. By using our Portal, you consent to any transfer of this information.

We will protect the privacy and security of Personally Identifiable Information according to this privacy statement, regardless of where it is processed or stored, however you explicitly acknowledge and consent to the fact that Personally Identifiable Information stored or processed in the United States will be subject to the laws of the United States, including the ability of governments, courts or law enforcement or regulatory agencies of the United States to obtain disclosure of your Personal Information.

#### **K. Changes to this Privacy Policy**

We reserve the right to update or modify this Privacy Policy from time to time. If we make any material changes to this Privacy Policy or the way we use, share or collect Personally Identifiable Information, we will notify you by revising the “Effective Date” at the top of this Privacy Policy, prominently posting an announcement of the changes on our Portal, or sending an email to the email address you most recently provided us (unless we do not have such an email address) prior to the new policy taking effect. Users are bound by any changes to the Privacy Policy when he or she uses our Portal after notice of such changes has been communicated. We encourage you to review this Privacy Policy regularly to ensure that you are familiar with PARS’ current practices.

#### **L. Information Correction, Removal, and Opting-Out**

##### **1. Correction & Removal**

If any of the information that we have about you is incorrect, or you wish to have your user account removed from our Portal, please contact us to update or delete your user account at: [plansupport@pars.org](mailto:plansupport@pars.org). We will respond to such inquiries within thirty (30) days.

##### **2. Opting Out**

Additionally, if you prefer not to receive marketing messages from us, please let us know by clicking on the unsubscribe link within any marketing message that you receive, or by sending a message to us at: [plansupport@pars.org](mailto:plansupport@pars.org).

##### **3. Your California Rights**

FOR RESIDENTS OF CALIFORNIA ONLY. Section 1798.83 of the California Civil Code requires select businesses to disclose policies relating to the sharing of certain categories of your Personally Identifiable Information with third parties. If you reside in California and have provided your Personally Identifiable Information to PARS, you may request information about our disclosures of certain categories of Personally Identifiable Information to third parties for direct marketing purposes. Such requests must be submitted to us at one of the following addresses: [plansupport@pars.org](mailto:plansupport@pars.org) or:

Public Agency Retirement Services  
Attn: California Privacy Rights

4350 Von Karman Avenue, Suite 100  
Newport Beach, CA 92660

Within thirty (30) days of receiving such a request, we will provide a list of the categories of Personally Identifiable Information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of those third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the address specified in this Section.

#### **M. Privacy Inquiries**

If you have any questions or concerns about this Privacy Policy or our privacy practices please contact us as follows:

- By emailing the Privacy Department at: [plansupport@pars.org](mailto:plansupport@pars.org).
- By mail post to:  
Public Agency Retirement Services  
Attn: Privacy Department  
4350 Von Karman Avenue, Suite 100  
Newport Beach, CA 92660

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