

Our Commitment to Privacy

U.S. Retirement & Benefits Partners (USRBP) and Kades-Margolis Capital understand that the privacy and security of the personal and account information that you have entrusted to us is of utmost importance. We value the opportunity to serve you, and we are obligated to honor that relationship with care. For this reason, we are committed to maintaining the confidentiality, integrity, and security of personal information about our current and prospective customers.

We have prepared this information to help you understand how we manage and secure your personal information. Please note that certain details of this policy may depend on whether you deal with us through an investment professional, through directly as an individual investor, or whether USRBP provides services to your employer or plan sponsor. In addition, the services that you receive may be provided by a third party that has different privacy policies. If services are provided through a third party, we will clearly identify where their privacy policies apply.

We understand that both information security and privacy are constantly changing, and that we must update our policies to reflect the highest standards of information security and privacy. The privacy policies of USRBP and Kades-Margolis Capital are reviewed annually. Our online notices are then updated to reflect any changes.

Who We Are

USRBP is made up of several firms each with their own identity. In this document, USRBP refers to our complete family of companies, including Kades-Margolis Capital.

How and Why We Ask for Your Personal Information

USRBP takes great care to protect personal information about you. When we do ask for and use your personal information, we do so with respect for your privacy. We may use personal information about you to service, maintain, and protect your account; process transactions in your account; respond to inquiries from you or your representative; develop, offer, and deliver products and services; or to fulfill legal and regulatory requirements. USRBP may collect public and non-public personal information about you from any of the following sources:

- You or your representative on applications or forms (for example, name, address, Social Security number, birth date, assets and income)
- You or your employer or plan sponsor if USRBP provides them with recordkeeping and/or benefits advisory services (for example, payroll, human resources, or benefits information)
- Transactional activity in your account (for example, trading history and balances)
- Other interactions with USRBP (for example, discussions with our customer service staff, information you enter on our websites, or when you enroll in our authentication services)
- Information from other third-party data services (for example, to verify your identity and to better understand your product and service needs)
- You or your representative regarding your preferences (for example, your choice of electronic statement delivery, or the screen layout you specify if you use our Internet sites)
- Other sources with your consent or with the consent of your representative (for example, from other institutions if you or your employer transfer products and services to USRBP).

How We Protect Your Information

At USRBP we are committed to protecting the privacy of the information we collect, use, and share about you. To protect your personal information from unauthorized access and use, we use security measures that comply with federal law and state law. These measures include computer safeguards and secured files and buildings.

Within USRBP we restrict access to personal information to those who require it to develop, support, offer and deliver products and services to you. All individuals who handle and manage personal information undergo annual training on the responsibilities and procedures involved in keeping your information safe.

When We Share Information

USRBP does not share personal information about our customers with third parties for use in marketing their products and services. We may share personal information with the following entities:

- Third party service providers who perform services such as printing and mailing for us at our direction
- Government agencies, other regulatory bodies and law enforcement officials for tax or compliance reporting purposes, in the case of suspicious activity, or in response to a legal request
- Other third-parties, with your consent or as directed by your representative
- Other organizations as permitted or required by law (for example for fraud prevention or to respond to a subpoena)
- Our service providers are obligated to keep the personal information we share with them confidential and use it only to provide services specified by USRBP.

If you receive the specific services listed below, USRBP may share the following information in order to provide those services.

- If USRBP provides workplace services to your employer or plan sponsor, such as payroll, human resources or benefits advisory and/or recordkeeping services, USRBP may exchange any information received in connection with such services with your employer or plan sponsor or others they may authorize.
- If you conduct business with USRBP through your investment professional, we may exchange information we collect with your investment professional or with others they may authorize.

Your Online Privacy

Our websites are a great way to find out more about our services, access informative articles and financial information relevant to our services to you. Privacy, security, and service in USRBP's online operations are just as critical as in the rest of our business. To protect your online information we use firewall barriers, encryption techniques, and authentication procedures, among other controls, to maintain the security of your online session and to protect your information from unauthorized access.

When you interact with us by using our websites, online services or mobile applications that are owned and controlled by USRBP, we manage your personal information in accordance with all the practices and safeguards described in this Privacy Policy.

We will not collect any personal, identifiable information without your knowledge. When you use our digital services, we may collect technical and navigational information, such as device type, browser type, Internet protocol address, pages visited, and average time spent on our digital services. We use this information for a variety of purposes, such as maintaining the security of your session, facilitating site navigation, improving website design and functionality, and personalizing your experience.

Non-Personal Information We Collect

Our site may create a temporary data file commonly known as a cookie. It may also track the areas of our website that you visit. We may collect information regarding the internet provider from which you are connecting to our site. We may also track the website from which you linked to our site. This information is used statistically and not to identify individuals.

We also use cookies help us maintain the security of our digital platforms and to personalize your experience, such as customizing your screen layout.

You can refuse or delete cookies. Most browsers and mobile devices offer their own settings to manage cookies. If you refuse a cookie, or if you delete cookies from your device, you may experience some inconvenience in your use of our digital offerings. 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.

Both USRBP and third-party service providers we utilize may use cookies and other technologies, such as web beacons, pixel tags, or mobile device ID in order to provide services to you.

Personal Information We Collect

You can visit the site and remain anonymous by not providing any personal information. However, you may choose to share this information by completing applications, online forms or requesting that we contact you. Personal information includes, but is not limited to name, address, phone number and email address. When using secure areas of this website to provide or access your personal information, the information is encrypted, making it indecipherable to third parties. Your browser will indicate that you are in a secure area by displaying a locked padlock in the bottom of the screen. While Internet connections cannot be guaranteed to be 100% secure, we have taken all reasonable measures to protect the information entered and accessed on the website. However, we cannot be liable for unintentional disclosure of information.

Our Mobile Applications

USRBP and our family of firms may from time to time offer mobile applications ("apps") that allow you to access your accounts and access news and research using wireless or mobile devices. Our privacy practices apply to any personal information or other information that we may collect through the apps.

Protecting children's privacy online

USRBP websites are not directed to individuals under the age of thirteen (13). USRBP does not intentionally collect information on USRBP websites from those we know are under 13, and we request that these individuals do not provide personal information through the sites.

Changes and Update to USRBP Privacy Policy

By using any USRBP or Kades-Margolis Capital digital services you consent to the collection and use of personal information as described in this Privacy Policy. This policy reflects USRBP's current business practices and is subject to change and update. In the event of a change, a revised policy will be posted on all USRBP web sites, mobile applications, and other digital properties along with an effective date. Continued use of USRBP digital services after this date represents acceptance of the revised policy.