

FACTS

WHAT DO ASPIRE FINANCIAL SERVICES, LLC AND ITS AFFILIATES DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers, employees and candidates for employment (“Covered Individuals”) the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do with your personal information.

What?

The types of personal information we collect and share depend on the product, service or employment relationship you have with us. This information can include:

- Name, address, e-mail address
- Social security number and income
- Employment information and account balances
- Investment experience and risk tolerance

When you are *no longer* a Covered Individual, we continue to share your information as described in this notice.

How?

All financial companies need to share personal information to run their everyday business. In the section below, we list the reasons financial companies can share Covered Individuals’ personal information; the reasons Aspire Financial Services, LLC (“Aspire”) chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Aspire share?	Can you limit this sharing?
For our everyday business purposes— Such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— We do not share information with our affiliates or other non-affiliated third parties to offer you products and services without your consent.	No	We do not share
For joint marketing with other financial companies	No	We do not share
For our affiliates’ everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes— information about your creditworthiness	No	We do not share
For nonaffiliates to market to you	No	We do not share
Questions?	Call us at 866-634-5873 (Aspire), 888-621-5491 (PCS), (833) 264-1502 (Aspire-IPX)	

What we do	
How does Aspire protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law and applicable state laws. These measures include computer safeguards and secured files and buildings.
How does Aspire collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • open an account or make deposits or withdrawals from your account • seek advice about your investments or tell us about your investment or retirement portfolio • enter into an investment advisory contract <p>Additionally, we may collect personal information during the employment application process and during employment.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes—information about your creditworthiness • affiliates from using your information to market to you sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>Our affiliates include our parent company, Fiduciary Services Group, LLC ("FSG"), and FSG's affiliated companies: AdvisorTrust, Inc.; PCS Retirement, LLC; ABG Consultants, LLC; Rocky Mountain Employee Benefits, Inc.; DWC ERISA Consultants, LLC; Fiduciary Advisors, LLC; and Efficient Advisors, LLC.</i></p>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>Although Aspire does not share with nonaffiliates to market to you, Aspire shares information to provide our services and to help a retirement plan's other service providers provide their services.</i></p>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <p><i>Aspire does not jointly market information.</i></p>
Other important information	
<p>Aspire shares information to provide its services and to help a retirement plan's other service providers, including nonaffiliates, provide their services.</p> <p>If you are a California resident, please refer to the enclosed supplement.</p>	

Aspire Financial Services, LLC Privacy Policy

Aspire Financial Services, LLC and its Affiliates (hereinafter “**Aspire**” or “**we**”) value the privacy of our employees, candidates for employment with us and individuals who use our websites and retirement plan services (collectively, our “**Services**”). This Privacy Notice explains how we collect, use and share the information of employees, candidates for employment and US residents who use our Services (“**Users**,” “**you**,” or “**your**”). By using our Services, you agree to the collection, use, disclosure and processing of your information as described by this Privacy Notice.

We collect Personal Data from US residents and comply with applicable state consumer privacy laws including but not limited to such laws enacted in California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, Nevada, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah and Virginia (“US Privacy Law”). For the purposes of this Notice, “Personal Data” means information that is linked or reasonably linkable to a particular individual or household. However, the following categories of information are not Personal Data:

- Publicly available information;
- Deidentified or aggregated data; or
- Information otherwise excluded from the scope of US Privacy Law.

This Privacy Notice provides the following information to US residents:

- Categories of Personal Data we collect;
- Purposes for which we use Personal Data;
- Categories of Personal Data we share with third parties;
- Categories of third parties with which we share Personal Data; and
- How US residents can exercise their rights under US Privacy Law:
 - The rights to access, correct, or delete Personal Data;
 - The right to obtain a portable copy of Personal Data;
 - The right to limit the use of sensitive Personal Data in certain circumstances;
 - The rights to opt out of targeted advertising, sales of Personal Data, or profiling; and
 - The right to appeal our decisions about your requests.

How We Use the Information We Collect

In addition to the purposes listed above, we may use the information we collect:

- To provide, maintain, improve and enhance our Services
- To understand and analyze how you use our Services and develop new products, services, features and functionality
- To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, respond to comments and questions and otherwise provide user support
- For marketing and advertising purposes, including developing and providing promotional and advertising materials that may be relevant, valuable or otherwise of interest to you
- To detect and prevent fraud and respond to trust and safety issues that may arise
- For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency
- For other purposes for which we may provide specific notice at the time the information is collected

- Typically, personal information is retained for the duration of a Covered Individual's status as such and for such periods thereafter as permitted by applicable US Privacy Law. Candidate and employee information is not deleted.

How We Share the Information We Collect

We share Personal Data with the following categories of third parties:

Processors. We may share any information we collect with processors retained in connection with the provision of our Services. These companies are only permitted to use this information on our behalf and according to our instructions. Our processors are not permitted to use your information for their own purposes.

Our Affiliates. We may share your information with our affiliates, subsidiaries and representatives as needed to provide our Services.

Our Business Partners. We may share relevant information about you with our business partners to enable them to provide their services to you or the related retirement plan.

We may also share your Personal Data with other parties for the following reasons:

As Required by Law. We may share your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our or others' rights, property or safety. In particular, we may share relevant information with the appropriate third parties if you post any illegal, threatening or objectionable content on or through our Services.

Merger, Sale, or Other Asset Transfers. We may transfer your information to service providers, advisors, potential transactional partners or other third parties in connection with the consideration, negotiation or completion of a corporate transaction in which we are acquired by or merged with another company or in which we sell, liquidate or transfer all or a portion of our assets. The use of your information following any of these events will be governed by the same general provisions of this Privacy Notice.

Consent. We may also share your information with your permission.

For more information on how we share the information we collect, see the table above. We do not sell Personal Data to anyone.

Your Rights and Choices

Our Communications.

From time to time, you may receive marketing or other informational email messages from us. You can unsubscribe from our promotional and informational emails via the link provided in the emails. Users may continue to receive administrative messages necessary to service User accounts after opting out of receiving promotional messages from us.

Cookies.

This section explains what cookies are and how we use them, the types of cookies we use and how to manage cookie settings.

Cookies are small text files that are used to store small pieces of information. They are stored on your device when the website is loaded on your browser. These cookies help us make the website function properly, make it more secure, provide a better user experience, understand how the website performs and to analyze what works and where it needs improvement.

Our website uses first-party and third-party cookies for several purposes. First-party cookies are mostly necessary for the website to function the right way, and they do not collect any of your personally identifiable data. The third-party cookies used on our website are for understanding how the website performs, keeping our services secure, all in all providing you with a better and improved user experience. Our website only uses strictly

necessary cookies.

Most web browsers allow you to manage cookies through the browser settings. To find out more about cookies, you can visit www.aboutcookies.org or www.allaboutcookies.org.

Our Partners.

To inquire about your choices regarding our business partners generally, contact us at privacy@401kaccountservices.com.

Your Rights.

US residents have the following rights under US Privacy Law:

- The rights to access, correct or delete Personal Data;
- The right to obtain a portable copy of Personal Data;
- The right to limit the use of Sensitive Personal Data in certain circumstances;
- The rights to opt out of targeted advertising, sales of personal data or profiling;
- The right not to receive discriminatory treatment for exercising your privacy rights; and
- The right to appeal our decisions about your requests if you disagree with them.

Exercising Your Rights.

If you are a US resident, you can submit a request to exercise your personal data rights by sending an email to privacy@401kaccountservices.com with the subject line "Privacy Rights Request". Please be aware that we do not accept or process rights requests submitted through other means.

To protect your privacy, we may need to authenticate your identity before we respond to your rights request. We will verify your identity by sending an email to your email address on file with instructions on where to upload additional documentation. We may ask you for additional information as part of this process, including the last four digits of your social security number. If you do not complete the verification process, we may be unable to process your request. Any information you provide to authenticate your identity will only be used to process your rights request and not for any other purpose.

We will respond to your rights request within 45 days (or within 15 days when required by US Privacy Law), and in certain cases we may inform you that we will need an additional 45 days to act on your request. If we suspect fraudulent or malicious activity on or from your account, we will delay acting on your request until we can appropriately verify your identity and the request as authentic. Also note that each of your rights are subject to certain exceptions that may permit or require us not to process your request.

We reserve the right to decline to process, or charge a reasonable fee for, requests from a US resident that are manifestly unfounded, excessive or repetitive.

Authorized Agents.

You may designate an authorized agent to make a rights request on your behalf. Your authorized agent may submit such a request by using the method(s) described above. We may require verification of your authorized agent's authority in addition to the information we require for verification of your identity.

Notice of Right to Limit the Use of Sensitive Personal Data

You have the right to limit some uses of Sensitive Personal Data. In general, you may direct companies not to use your Sensitive Personal Data except as necessary to provide goods or services you have requested or to further certain other exempt purposes.

However, we only use Sensitive Personal Data for purposes that are exempt from this right, such as to provide

you with goods or services you have requested, to detect and prevent security incidents, or verifying the quality of our goods and services. The full list of these exempt purposes is specified in California Code of Regulations, Title 11, Section 7027(m).

Children’s Data

We do not knowingly collect or use the Personal Data of children under 16. If you believe that we have collected the Personal Data of a child under 16, please contact us at privacy@401kaccountservices.com.

Information Regarding Our Handling of Consumer Privacy Requests

This section of our Privacy Notice provides information about rights requests we have received and processed. During 2024, we received and responded to privacy requests from all users as follows:

Request Type	Statistics
Request to Know	Number Received: 0 Number Complied With: All Number Denied:* 0 Average Response Time: N/A days
Request to Correct	Number Received: 0 Number Complied With: All Number Denied:* 0 Average Response Time: N/A days
Request to Delete	Number Received: 0 Number Complied With: All Number Denied:* 0 Average Response Time: N/A days
Request to Limit	Number Received: 0 Number Complied With: All Number Denied:* 0 Average Response Time: N/A days
Request to Opt-Out of the Sale or Sharing	Number Received: 0 Number Complied With: All Number Denied:* 0 Average Response Time: N/A days

* Denied requests: Requests to know and to delete are denied when we are unable to verify the identity of the requestor. We are unable to process an opt-out request if the data provided by the requestor (for example, an email address) cannot be matched to data in our records.

Third-Party Content

Our Services may contain links to other websites, products or services that we do not own or operate. We are not responsible for the content provided by, or the privacy practices of, these third parties. Please be aware that this Privacy Notice does not apply to your activities on these third-party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.

Security

We make reasonable efforts to protect your information by using administrative, technological and physical safeguards designed to improve the security of the information we maintain and protect it from accidental loss, unauthorized access or use or any other inappropriate or unlawful processing. However, because no information system can be 100% secure, we cannot guarantee the absolute security of your information.

International Visitors

Our Services are hosted in the United States and intended for visitors located within the United States. If you choose to use the Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your information outside of those regions to the United States for storage and processing. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Services. By using our Services, you consent to the transfer, storage and processing of your information as described in this Privacy Notice. If we do transfer your data from the United States to other countries, we will continue to comply with applicable US laws and the laws of the country where the data is being stored and processed.

Changes to this Privacy Notice

We will post any adjustments to the Privacy Notice on this page, and the revised version will be effective when it is posted. If we make material changes, we may notify you by posting a notification on our website. We encourage you to read this Privacy Notice periodically to stay up to date about our privacy practices.

Contact Us

If you have any questions, comments, or concerns about our processing activities, please email us at privacy@401kaccounts.com.

Privacy Notice Supplement for California residents

Each of Aspire Financial Services, LLC; PCS Retirement, LLC; ABG Consultants, LLC; Rocky Mountain Employee Benefits, Inc.; and AdvisorTrust, Inc. (each referred to with “we”, “us”, “our”) furnishes this notice.

This Privacy Notice Supplement for California residents supplements the information in our national Privacy Notice. This applies only to a human who resides in the State of California (“consumer” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (“CCPA”). Terms defined in the CCPA have the same meaning when used in this notice. This notice was last modified on May 29, 2025.

Information we collect

We collect information that could identify, relate to, describe, refer to, be associated with, or be linked, directly or indirectly, with a particular consumer or device (“personal information”), which, in certain instances, may constitute sensitive personal information under the CCPA. In particular, we collected some of these categories of personal information from some consumers in the last 12 months:

	Category	Examples	Collected?
A	Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number or other similar identifiers. In the case of employees, employee photos and audio and video recordings of employees.	Yes
B	Personal information categories listed in California’s Customer Records law [Cal. Civ. Code § 1798.80(e)]	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number or any other financial information, medical information or health insurance information	Yes
C	Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status genetic information (including familial genetic information)	Yes
D	Commercial information	Records of personal property, products or services purchased, obtained or considered or other purchasing or consuming histories or tendencies	Yes
E	Biometric information	Genetic, physiological, behavioral and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health or exercise data	No
F	Internet or other similar network activity	Browsing history, search history, information on a consumer’s interaction with a website, application or advertisement (other than on our websites or through our communications)	No
G	Geolocation data	Physical location or movements (including IP address)	Yes
H	Sensory data	Audio, electronic, visual, thermal, olfactory or similar information	No
I	Professional or employment-related information	Current or past job history or performance evaluations (other than dates of employment with employers on our system)	No
J	Nonpublic education information (under the Family Educational Rights and Privacy Act [20 U.S.C. § 1232g; 34 C.F.R. part 99])	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information or student disciplinary records	No
K	Inferences drawn from other personal information	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes	Yes

Personal information does not include:

- publicly available information from government records;
- deidentified or aggregated consumer information;
- information excluded from the CCPA's scope, such as:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including
 - the Fair Credit Reporting Act (FCRA);
 - the Gramm-Leach-Bliley Financial Modernization Act (GLBA);
 - the California Financial Information Privacy Act (FIPA); and
 - the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from these categories of sources:

- our (and our affiliates') service providers;
- your retirement plan's or other account's custodians;
- your retirement plan's administrators (which usually includes your employer), trustees, investment managers, investment advisers and other fiduciaries;
- directly from you (for example, from forms you complete, or investments or services you use);
- indirectly from you (for example, by observing your actions in our websites and other computer apps);
- from information publishers and services we use, including LexisNexis and Trulioo.

Use of personal information

We may use or disclose the personal information we collect for one or more of these business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask about our services, we will use that personal information to respond to your inquiry. If you provide your personal information to use a service, we will use that information to perform or facilitate the service. We may also save your information to facilitate new services.
- To provide, support, personalize and develop our website, products and services.
- To create, maintain, customize and secure your account with us.
- To process your requests, purchases, transactions and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products and services.
- To respond to law enforcement requests, and as required by law, a court's order or legal process.
- As described to you when collecting your personal information, or as otherwise provided in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us is among the assets transferred.

We do not process personal information for advertising or profiling purposes. We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated or incompatible purposes without providing you notice.

Sharing personal information

We may disclose your personal information to a service provider or third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with these categories of third parties:

- our (and our affiliates') service providers;
- your retirement plan's or other account's custodians;

- your retirement plan's administrators (which usually includes your employer), trustees, investment managers, investment advisers and other fiduciaries;
- an insurance or investment issuer (if needed to meet a duty or obligation about banking, insurance, or securities law);
- third parties as disclosed to you.
- in the case of our employees, with insurance providers who provide insurance to our employees.

Disclosures of personal information for a business purpose

In the preceding 12 months, we disclosed these categories of personal information for a business purpose:

- A) Identifiers.
- B) California Customer Records personal information categories.
- C) Protected classification characteristics under California or federal law.
- D) Commercial information.
- E) We did not disclose biometric information.
- F) We did not disclose internet or other similar network activity.
- G) We did not disclose geolocation data.
- H) We did not disclose sensory data.
- I) Professional or employment-related information.
- J) We did not disclose nonpublic education information.
- K) Inferences drawn from other personal information.

We disclose your personal information for a business purpose to these categories of third parties:

- our service providers;
- your retirement plan's or account's service providers, even if not our service provider; and
- your retirement plan's or account's fiduciaries.

Sales of personal information

In the preceding 12 months, we had not sold personal information.

Your rights and choices

The CCPA provides California residents with specific rights regarding their personal information. This part describes your CCPA rights and explains how to exercise those rights.

Access to specific information and data-portability rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see "Exercising access, data-portability and deletion rights"), we will disclose to you:

- the categories of personal information we collected about you.
- the categories of sources for the personal information we collected about you.
- our business or commercial purpose for collecting or selling that personal information.
- the categories of third parties with whom we share that personal information.
- the specific pieces of personal information we collected about you (a data-portability request).
- if we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Right to delete information

With some exceptions, you have the right to request that we delete any of your personal information we collected from you and retained. Typically, personal information is retained for the duration of a Covered Individual's status as such and for periods thereafter as permitted by applicable US Privacy Law. Candidate and employee information is retained after a candidate for employment's candidacy is no longer active and, in the case of employees, is retained after separation. Once we receive and confirm your verifiable consumer request (see "Exercising access, data-portability and deletion rights"), we will, unless an exception applies, delete (and direct our service providers to delete) your personal information from our (and their) records.

We may deny your request if we need the information for us or our service provider to:

- complete the transaction for which we collected the personal information.
- perform our contract with you.
- provide a good or service you requested.
- take actions anticipated within the context of our ongoing business relationship with you.
- meet a duty or obligation to your retirement plan, or to its administrator, trustee, custodian, investment manager, investment adviser, or fiduciary.
- meet a duty or obligation under a law that regulates banking, insurance, or securities.
- detect security incidents.
- protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- debug products to identify and repair errors that impair existing intended functionality.
- exercise free speech.
- ensure the right of another person to exercise their free-speech rights.
- ensure the right of another to exercise another right provided for by law.
- comply with the California Electronic Communications Privacy Act [Cal. Penal Code § 1546 1546.4].
- engage in public or peer-reviewed scientific, historical, or statistical research—if you previously provided informed consent—in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement.
- enable solely internal uses aligned with consumer expectations based on your relationship with us.
- comply with a legal obligation.
- make other internal and lawful uses of that information compatible with the context in which you provided it.

Exercising access, data-portability and deletion rights

To exercise the access, data-portability, and deletion rights described above, please submit a verifiable consumer request to us by:

- calling Aspire at 866-634-5873, PCS at 888-621-5491, and Aspire-IPX at 833-264-1502; or
- emailing us at privacy@401kaccountservices.com

Only you (or a person registered with the California Secretary of State that you authorize to act on your behalf) may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may request access or data portability only twice within a 12-month period.

A verifiable consumer request must:

- provide sufficient information that allows us to verify you are the person about whom we collected personal information (or the person's authorized representative); and
- describe your request with sufficient detail that allows us to properly understand, evaluate and respond to your request.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to have an account with us.

We will use personal information provided in a verifiable consumer request only to verify the requestor's identity or authority to make the request.

Response timing and format

We try to respond to a verifiable consumer request within 45 days of our receipt. If we require more time (up to 90 days), we will inform you in writing of the reason and extension period.

If you have an account with us, we will deliver our written response to that account. If you have no account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will cover only the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data-portability requests, we will select a format that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We charge no fee to process or respond to your verifiable consumer request unless it is excessive, repetitive or manifestly unfounded. If we require a fee, we will tell you why we made that decision and give you a cost estimate before we complete your request.

Your rights about sales of personal information

Because we do not sell personal information, this notice does not explain opt-out or opt-in rights.

Non-discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- deny you goods or services.
- charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- provide you a different level or quality of goods or services.
- suggest that you may receive a different price or rate for goods or services, or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that could result in different prices, rates or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms. Participation in a financial incentive requires your prior opt-in consent, which you may revoke at any time.

Other California privacy rights

Nothing in this notice about the CCPA weakens your rights under other California laws.

Changes to our Privacy Notice

We reserve the right to change our Privacy Notice, including our national notice and our California supplement. When we change our Privacy Notice, we will post the updated notice on our website. Also, we'll send you a notice to the extent law requires.

How to contact us

If you have any question about this notice, the ways in which we collect or use personal information, your choices and rights about a use or how to exercise your rights under California law, please contact us at:

Phone: 866-634-5873 (Aspire), 888-621-5491 (PCS), or 833-264-1502 (Aspire-IPX)

Website: <https://www.pcsretirement.com/aspire>

Email: privacy@401kaccounts.com

Mail: Aspire Financial Services, LLC

Attn: General Counsel

1818 Market Street, Suite 930

Philadelphia, PA 19103