



4860 College Blvd.
Overland Park, KS 66211
(913) 338-5300

PRIVACY NOTICE

RIA values the trust its retirement plan clients have placed in it and is committed to the responsible management, use, and protection of information it acquires regarding the plan, its sponsor, and the plan's participants.

As you read this document, please note that federal privacy laws only apply to individuals who have purchased a financial product or service for personal, family, or household purposes. As a result, the laws do not apply to retirement plans (including the participants and beneficiaries of such plans) or other entities. However, it is the intent of RIA to maintain the confidentiality of any nonpublic, personal information of its retirement plan clients (including their participants and beneficiaries) as if that information was protected by federal privacy laws, and we will only disclose such information pursuant to the exceptions set forth below, unless specifically requested by the client.

Information We Collect From You

RIA collects personal information about retirement plan participants and beneficiaries to help it provide the Services; offer new products or services, and fulfill legal and regulatory requirements. RIA collects information about its customers from the following sources:

- information provided to us, our affiliates, or our investment advisor representatives, such as from the Client in the course of RIA's provision of the Services to the plan or from plan participants in connection to our investment education or financial wellness services.
- information provided by other unaffiliated third parties, such as from the plan's recordkeeper or custodian.
- information gleaned from public sources, such as the plan's Form 5500 filing.

This information may include "nonpublic, personal information," which means information that is not readily known or accessible in the public realm, such as a participant's social security number, birth date, net worth, assets, and income.

Sharing Information

RIA will not disclose nonpublic personal information related to the Client or any of the plan's participants or beneficiaries without prior consent, unless the disclosure is needed to:

- provide the Services, including:
 - providing advice to the Client regarding the utilization of the plan's investment options and/or effectiveness of the plan's design in helping participants reach their retirement goals;
 - providing investment education or financial wellness services to the plan's participants;
 - providing concierge service to the Client in working with the plan's vendors;
 - provide the Client or the plan's participants with marketing materials regarding RIA's products and/or services, as well as those offered pursuant to joint agreements with our affiliates or non-affiliated third parties, so long as all parties offering the products and/or services have agreed, in writing, to protect the confidentiality of the Client's information and not use it for any other purpose;



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- enforce any of RIA's rights, including the collection of any fees or other payments due;
- provide any of RIA's affiliates with information regarding its operations, or as reasonably required pursuant to the proposed or actual sale, merger, transfer, or exchange of all, or a portion of, its business;
- comply with the request or requirements of regulatory and/or law enforcement organizations;
- respond to a subpoena or discovery request; or
- provide disclosures as otherwise permitted or required by law.

RIA may provide such information to RIA's affiliates and/or unaffiliated financial or non-financial services providers as necessary pursuant to the exceptions listed above. However, RIA will not sell, share, or disclose any nonpublic personal information to unaffiliated third-party marketing companies.

Safeguarding Information

RIA recognizes the need to prevent unauthorized access to the information it collects, including information held in electronic format. As a result, RIA limits access to customers' confidential or nonpublic personal information only to personnel who need the information to provide the Services. RIA maintains physical, electronic, and procedural safeguards regarding its customers' information to ensure it complies with this policy, industry practices, and federal and state regulations, including after this Agreement is terminated.