

**SHEET METAL WORKERS LOCAL NO. 46
PENSION, HEALTH, AND ANNUITY FUNDS**

Website Privacy Policy

This Website Privacy Policy (“Policy”) describes how the Sheet Metal Workers Local No. 46 Pension, Health, and Annuity Funds (collectively, the “Funds”) treat the personal information collected through this website (“Portal”) and what the Funds do with that information. By using or accessing the Portal, you are accepting the practices described in this Policy. This Policy applies only to information collected online through the Portal and does not describe the ways in which we may collect or use information obtained offline or through any other means. We may amend this Policy at any time. A notice of such change will be posted on the Funds’ website prior to the implementation of such change. This Website Privacy Policy was last updated on April 20, 2022.

How the Funds collect data

The Funds collect personal information as required or permitted by law.

Based on the services or benefits you receive that the Funds administer, your personal data may be collected from the following sources:

- From you when you communicate with us by email, by web, by correspondence, or by phone.
- From your employer when contributions are remitted to the Funds on your behalf.
- Information you provide on the Portal (such as information about your dependents or retirement goals).
- From you, or your representative, when you complete applications and forms for various services or benefits.
- From service providers such as payroll providers, insurance carriers or third-party administrators.
- From activity in your account.
- From your device when you browse websites or mobile applications (see cookies section below).

How the Funds use data

The Funds use your personal data to respond to your requests and inquiries and to provide you with services and benefits administered by the Funds. In the event you receive services pursuant to a services agreement between one or more of the Funds and a third party, the Funds will process your data to perform the services in accordance with that agreement.

The Funds will use your data for other purposes as permitted by law, including to meet the requirements of applicable laws and regulations.

The Sheet Metal Workers Local No. 46 Health Fund maintains HIPAA Privacy Policies and Procedures that specifically address how the Fund maintains and protects your Protected Health Information. The HIPAA Privacy Policies and Procedures are available at the Funds Office.

How the Funds share data

The Funds limit the information shared and the parties it is shared with. The Funds do not sell your personal data. The Funds do not share your personal data in any way that requires that they offer you an "opt-out" of such sharing.

Personal data may be shared as necessary to effect, administer, or enforce a transaction you request or authorize, with your consent, at your direction, or as allowed by applicable law.

For example:

- Service Providers – Your personal data may be shared with the Funds' third-party administrators, advisors, and service providers as authorized or directed by the Funds.
- Health Information – Your health information will not be shared except as permitted or required by law. Sheet Metal Workers Local No. 46 Health Fund maintains HIPAA Privacy Policies and Procedures that specifically address how the Fund maintains and protects your Protected Health Information. The HIPAA Privacy Policies and Procedures are available at the Funds Office.

Other disclosures of your data may include:

- To protect against or prevent actual or potential fraud, unauthorized transactions, claims or other liability.
- To persons acting in a fiduciary or representative capacity on your behalf.
- To provide information to persons assessing our compliance with industry standards, and our attorneys, accountants and auditors.
- To comply with federal, state, or local laws, rules, and other applicable legal requirements.
- To comply with a properly authorized civil, criminal or regulatory investigation or subpoena or summons by federal, state or local authorities, or to respond to judicial process or government regulatory authorities having jurisdiction over the financial institution for examination, compliance or other purposes as authorized by law.
- To report claims experience or for an audit.
- For purposes otherwise permitted or required by law.

After your relationship with us ends, the terms of this policy shall continue to be applicable to your data as long as the Funds retain your data.

Security

The Funds use physical, administrative and technical safeguards designed to protect the confidentiality, integrity and availability of your personal information. Any third-party service providers with whom the Funds share your personal information agree to maintain the confidentiality and security of the personal data and use it solely to provide their services to the Funds or to you.

Portal use

When you access the Portal, the Funds or their third-party suppliers use a variety of technologies, such as cookies that automatically collect data (e.g. your device type, browser type, internet protocol address, operating system used, number of visits, average time spent on the site and pages viewed). This data is used to operate the Portal more efficiently, maintain the security of your online session, and improve our Portal's design and navigation. The Funds use this information internally to provide you with a better user experience.

Some of our Portals include links or navigation to third-party sites. These third-party sites may include informational sites, sites providing financial wellness tools and services, or services offered to you solely by a third party, as further described in the disclosures provided on such sites.

Cookies

A "cookie" is a small summary text file that is stored by your mobile phone (e.g., iPhone or Android) or by your browser (e.g., Internet Explorer, Edge, Chrome, Safari, or Firefox). Cookies allow a website to store some information about users, allowing the website to recognize a user and respond appropriately.

- The Portal may use cookies to collect anonymous usage statistics to track site utilization. Identifiable visitor usage information may also be stored in internal log files. The Funds use this information to troubleshoot issues, improve our online services, and for analytical purposes, such as analyzing trends, administering the Portal, tracking user movements and gathering broad demographic information.
- The Portal utilizes cookies to ensure basic functionality for authenticated users, including but not limited to initiating and terminating valid sessions.

If you do not want to have cookies on your computer or device, you can use the settings or tools offered on your browser to refuse or deny cookies, or to delete cookies that have already been stored. If you refuse or delete cookies, you may notice an impact on your use of the

Portal; for example, you may not be able to sign in and access your account without additional authentication.

Requests, questions, or complaints

The “General Information” tabs on the Portal include helpful tips about how to keep your online account secure. You may send your requests, questions or complaints or contact us by mail at the address below:

Sheet Metal Workers Local No. 46 Pension, Health, and Annuity Funds Office
244 Paul Road
Rochester, NY 14624

Attn: Mindy LaClair, Benefits Coordinator