



Lockton Investment Advisors, LLC

Privacy Policy Notice

Purpose of this Notice

Title V of the Gramm-Leach-Bliley Act (GLBA) generally prohibits any financial institution, directly or through its affiliates, from sharing nonpublic personal information about you with a nonaffiliated third party unless the institution provides you with a notice of its privacy policies and practices, such as the type of information that it collects about you and the categories of persons or entities to whom it may be disclosed. In compliance with the GLBA, we are providing you, as the employer, with this document, which notifies you of the privacy policies and practices of Lockton Investment Advisors, LLC.

Our Privacy Policies & Practices

1. Information we collect:

We collect nonpublic personal information about our customers from forms or other documentation that may include name, address, phone number, social security number, beneficiary information, and date of birth.

2. Information we may disclose to affiliated third parties:

We may disclose all of the personal information we collect about our customers, as described above, in order to provide certain services to the accounts.

3. Nonaffiliated third parties to whom disclosures may be made:

We may disclose nonpublic personal information about our customers to financial service providers, such as plan sponsors and their affiliates and representatives, as needed to service the accounts. We do not disclose nonpublic personal information to any other unaffiliated third parties, except as permitted or required by law.

4. Our practices regarding information confidentiality and security:

We restrict access to nonpublic personal information about our customers to those associates who need to know that information in order to provide services to the account. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard such nonpublic personal information.

5. Our policy regarding dispute resolution:

Any controversy or claim arising out of or relating to our privacy policy, or the breach thereof, shall be settled by arbitration in accordance with the rules of the American Arbitration Association, and judgment upon the award rendered by the arbitrator(s) may be entered in any court having jurisdiction thereof.

6. Personal information of former customers:

Our personal information privacy policy also applies to former customers.

7. Changes in privacy policy:

We may modify our privacy policy at any time. We will notify you of such changes at least annually.