

## **Disclaimer**

**1/4/2024 Version**

This web site and the materials contained herein are a conglomeration of information made available to agents in assisting consumer retirement planning. Thomas Gold Solutions is not responsible for assumptions, projections and conclusions reached by the agent or the consumer. While Thomas Gold Solutions has made every effort to maintain accuracy of information provided by this site, it cannot and does not GUARANTEE the accuracy of all calculations and is not responsible for errors and omissions. Any errors or discrepancies, noted, should be reported immediately to Thomas Gold Solutions so they may be corrected.

## **Privacy Policy**

Thomas Gold Solutions, LLC and its subsidiaries (“TGS”), respect your concerns about privacy and are committed to protecting it through our compliance with this Privacy Policy. References in this Privacy Policy to “TGS”, “we”, “us”, and “our” are references to the TGS entity responsible for the processing of your personal information, which generally is the TGS entity that collects your personal information.

This Privacy Policy describes the types of personal information we obtain, how we may use that personal information, with whom we may share it and how you may exercise your rights regarding our processing of that information. The Privacy Policy also describes the measures we take to safeguard the personal information we obtain and how you can contact us about our privacy practices. This Privacy Policy applies to the personal information we obtain through TGS websites, training services, communications between you and TGS, and other tools offered by TGS that reference this Privacy Policy (the “Platforms”). This Privacy Policy does not apply to other TGS products and services that post or reference separate privacy policies.

In connection with providing support, cloud and other services related to the TGS Retirement Analyzer, TGS processes certain data maintained in environments that TGS may access to perform cloud, consulting and support services (“Customer Content”) on behalf of and at the direction of its customers and partners, as well as log data (e.g., regarding access and authentication requests) that we collect for analysis and security purposes across our services.

## **Frequently Asked Questions:**

- Will I have unrestricted access to my Customer Content if I decide not to continue with TGS? No, to continue to access your Customer Content over the TGS platform, you must continue to subscribe and pay for TGS’s services.
- When I delete my Customer Content, will any of it remain available? Certain Customer Content may remain available for a period of time after deletion, so that you can work with customer support to access inadvertently deleted information.

- Does TGS notify me of security breaches? Yes, except for in the rare cases where TGS may be restricted by law from notifying you, TGS will provide prompt notification of any security breaches. Such notification will be provided on or before the expiration of any notification timelines required by state law or federal statute.
- Does TGS sell or share my Customer Content without written permission from me? No, TGS does not sell your data without your permission. Certain third party service providers (bound by contractual confidentiality obligations) to TGS may have access to the data in connection with the services provided to TGS and TGS may be compelled by law to share data in certain limited circumstances (for example, if subpoenaed), but TGS does not otherwise share Customer Content.
- Does TGS agree to notify me if any of my Customer Content is subpoenaed, and agree to give me reasonable time to respond before producing the requested data? Yes, so long as TGS is not restricted by law or advice of legal counsel, TGS will notify you if your Customer Content is subpoenaed.

### **Use of Platforms Subject to End-User Agreements**

Our use of such Customer Content and log data is subject to the terms of our end-user customer agreements and is not governed by this Privacy Policy. In contrast, the information we collect through our customers' and partners' use of our Platforms (such as names, addresses, billing information and employee contact information) and through our offline interactions with customers and partners is subject to the terms of this Privacy Policy.

### **Applicability of This Privacy Policy**

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Platforms. By accessing or using our Platforms, you agree to this Privacy Policy. This Privacy Policy may change from time to time. Your continued use of the Platforms after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### **Personal Information We Obtain**

The data we obtain varies based on the Platforms you use. We obtain personal information through your interaction with the Platforms, such as when you:

- Register and create an account;
- Sign up for a free trial of the TGS Retirement Analyzer;
- Purchase a subscription for the TGS Retirement Analyzer;
- Request products (including product evaluations, trials, tech preview and beta downloads), services or information;
- Participate in TGS events, surveys, questionnaires, research or evaluations;
- Obtain training and/or support;
- Correspond with us or request information from us.

The types of personal information we obtain include:

- Contact information (such as name, email address, telephone number, postal or other physical address);
- Information used to create your online account (such as username and password);
- Biographical and demographic information (such as gender, date of birth, marital status, job title/position and occupation);
- Billing and financial information (such as name, billing address, payment card details and bank account information and purchase history);
- Details about current employment;
- Location data (such as data derived from your IP address, country and zip code);
- The geolocation of your device;
- Information about your computer and internet connection, including your IP address, operating system, and browser type that we obtain through the use of cookies, web beacons and similar technologies (see our description of Cookies and Other Technologies below);
- Information related to participation in training services;
- Information necessary to provide support or other paid consulting services (such as contact details, chat services, support details, and event history);
- Personal information contained in content you submit to us (such as through our “Contact” feature or messaging);
- Other personal information we obtain through our Platforms.

Please note that providing personal information to us is voluntary on your part. If you choose not to provide us certain information, we may not be able to offer you certain products and services, and you may not be able to access certain features of the Platforms.

## **How We Use Personal Information**

We use the information we obtain to:

- Provide and administer our products and Platforms (including websites and other Platforms for which you have registered);
- Process and fulfill orders in connection with our products and services and keep you informed about the status of your order;
- Help you complete a transaction or order and provide customer support;
- Bill you for products and services you purchased;
- Provide training, support and consulting services;
- Create and manage your account with TGS;
- Operate, evaluate and improve our business (such as by administering, developing, enhancing and improving our products and services; managing our communications and customer relationships; and performing accounting, auditing, billing, reconciliation and collection activities);
- Perform data analytics (such as research, trend analysis, financial analysis and customer segmentation);
- Communicate with you about your account and orders (including sending emails relating to your registration, account status, order confirmations,

- renewal or expiration notices and other important information);
- Conduct marketing and sales activities (including sending you promotional materials, generating leads, pursuing marketing prospects, performing market research, determining and managing the effectiveness of our advertising and marketing campaigns and managing our brand);
  - Communicate with you about, and administer your participation in, events, programs, promotions and surveys;
  - Verify your identity and protect your account against unauthorized use or abuse of our services;
  - Protect against, identify and prevent fraud and other unlawful activity, claims and other liabilities;
  - Comply with and enforce relevant industry standards, contractual obligations and our policies;
  - Maintain and enhance the security of our Platforms, products, network services, information resources and employees;
  - Respond to your inquiries.

We may combine data collected from you with other sources to help us improve the accuracy of our marketing and communications as well as to help expand or tailor our interactions with you. This includes combining personal information we obtain through our Platforms, as well as other information (such as referral programs), for the purposes described above. We may anonymize or aggregate personal information and use it for the purposes described above and for other purposes to the extent permitted by applicable law. We also may use personal information for additional purposes that we specify at the time of collection. We will obtain your consent for these additional uses to the extent required by applicable law.

Where required by applicable law, we will obtain your consent for the processing of your personal information for direct marketing purposes.

### **Compliance with the Google API Services User Data Policy**

TGS's Retirement Analyzer and C3 applications utilize Google APIs to allow you to sync your Google calendar and other information with the applications.

TGS's use and transfer of data to any other app of information received from Google APIs will adhere to the [Google API Services User Data Policy](https://www.thomasgold.com/privacyPolicy) at <https://www.thomasgold.com/privacyPolicy>, including the Limited Use requirements.

### **Cookies and Other Technologies**

TGS uses cookies, web beacons (including pixels and tags), and similar technologies on our Platforms that collect certain information about you by automated means. A "cookie" is a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser. A "web beacon," also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server.

We use these automated technologies to collect information about your equipment, browsing actions, and usage patterns. The information we obtain in this manner includes IP address and other identifiers associated with your devices, types of devices connected to our Platforms, device characteristics (such as operating system), language preferences, referring/exit pages, navigation paths, access times, browser preferences and characteristics, installed plugins, local time zones, local storage preferences, clickstream data and other information about your online activities. Some of these cookies are session cookies (which are automatically deleted when you close your browser) and others are persistent cookies (which remain on your computer or other Internet-connected device for a period of time after you end your browsing session, unless you delete them).

Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of our Platforms. For mobile devices, you can manage how your device and browser share certain device data by adjusting the privacy and security settings on your mobile device.

To the extent required by applicable law, we will obtain your consent before using cookies or similar tools.

## **How We Share Your Personal Information**

We do not sell or otherwise disclose personal information about you except as described in this Privacy Policy or at the time of collection. TGS may share personal data in the following ways:

- If sharing your data is necessary to provide a product, service or information you have requested;
- To keep you up to date on the latest product announcements, software updates, special offers or other information we think you would like to hear;
- Within TGS (including among affiliates and subsidiaries) for the purposes described in this Privacy Policy;
- With our customers to report and help manage issues requiring support or as part of consulting services;
- With our customers and partners to inform them about their users' use of our services;
- With service providers we have engaged to perform services on our behalf (such as payment processing, order fulfillment, data storage, data protection, and data analytics). These service providers are contractually required to safeguard the information provided to them and are restricted from using or disclosing such information except as necessary to perform services on our behalf or to comply with legal requirements.

We also may disclose personal information about you (1) if we are required or permitted to do so by applicable law, regulation or legal process (such as a court order or subpoena), (2) to law enforcement authorities or other government officials to comply with a legitimate legal request, (3) when we believe disclosure is necessary to prevent physical harm or financial loss to TGS, its users or the public as required or permitted by law, (4) to establish, exercise or defend our legal rights,

and (5) in connection with an investigation of suspected or actual fraud, illegal activity, security or technical issues.

In addition, we reserve the right to transfer to relevant third parties information we have about you in the event of a potential or actual sale or transfer of all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation) or other business transaction.

We also may share the information in other ways for which we provide specific notice at the time of collection and obtain your consent to the extent required by applicable law.

## **Your Rights and Choices**

To the extent provided by the law of your jurisdiction, you may request access to the personal information we maintain about you or request that we correct, update, amend or delete your information, or that we restrict the processing of such information by contacting us as indicated below. To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain. Depending on your location, you may have the right to file a complaint with a government regulator if you are not satisfied with our response.

When you use our Platforms, both we and certain third parties (such as our advertising networks, digital advertising partners and social media platforms) may collect personal information about your online activities, over time and across third-party websites. Certain web browsers allow you to instruct your browser to send Do Not Track (“DNT”) signals to websites you visit, informing those sites that you do not want your online activities to be tracked. Your use of such DNT signal may restrict or reduce your ability to use our Platforms.

Where provided by law, you may withdraw any consent you previously provided to us or object at any time on legitimate grounds to the processing of your personal information, and we will apply your preferences going forward. This will not affect the lawfulness of our use of your information based on your consent before its withdrawal.

## **How We Protect Personal Information**

We maintain administrative, technical and physical safeguards, consistent with legal requirements where the personal information was obtained, designed to protect against unlawful or unauthorized destruction, loss, alteration, use or disclosure of, or access to, the personal information provided to us through the Platforms.

## **Retention of Personal Information**

To the extent permitted by applicable law, we typically retain personal information we obtain about you for as long as it is needed (1) for the purposes for which we

obtained it, in accordance with the terms of this Privacy Policy, which generally means that we will keep your personal information for the duration of our relationship or as long as you keep your account open with us; or (2) to take into account applicable statute of limitation periods and comply with applicable laws, resolve disputes and enforce our agreements. To the extent provided by the law of your jurisdiction, you may request that we delete your information or restrict the processing of such information by contacting us as indicated below.

### **Notice to California Residents**

Subject to certain limits under California law, California residents may ask us to provide them with (1) a list of certain categories of personal information we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, and (2) the identity of those third parties. To obtain this information, please send an email to [privacy@thomasgold.com](mailto:privacy@thomasgold.com) with "California Shine the Light Privacy Request" in the subject line and in the body of your message.

### **Children's Personal Information**

The Platforms are designed for a general audience and are not directed to children under the age of 13. We do not knowingly collect or solicit personal information from children under the age of 13 through the Platforms. If we become aware that we have collected personal information from a child under the age of 13, we will promptly delete the information from our records. If you believe that a child under the age of 13 may have provided us with personal information, please contact us at [privacy@thomasgold.com](mailto:privacy@thomasgold.com)

### **Changes to Our Privacy Policy**

This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our information practices. We will indicate at the top of this Privacy Policy when it was most recently updated. We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices.

### **How To Contact Us:**

If you have any questions or comments about this Privacy Policy or if you would like us to update information we have about you or your preferences, please contact us by email at [privacy@thomasgold.com](mailto:privacy@thomasgold.com) or write to us at:

Thomas Gold Solutions

3100 West Ray Road

Suite 201

Chandler, AZ 85226