BNY Mellon Privacy Policy – Benefit Disbursements Participant Website

PRIVACY POLICY

This Privacy Statement provides information about what type of information is gathered and tracked on the website, how the information is used and with whom the information is shared. By visiting this website, and/or using the services offered on or through this website, you agree to the terms of this Privacy Policy as they may be amended from time to time. As we update and expand our services, this Privacy Policy may change, so check back to this page from time to time. This Privacy Policy is incorporated into, and part of, the Terms of Use, which govern your use of this website. References to "we" and "us" (and similar references) mean The Bank of New York Mellon. References to the "website" or "site" mean the Benefit Disbursements Participant Website made available by The Bank of New York Mellon pursuant to agreement between FRS and The Bank of New York Mellon.

About this Site

Reasonable and customary precautions are being exercised to protect personal information you send to or receive from this website and while it is stored for future use. Your access to this site is subject to your control, through your use of your username and password, which is your responsibility to keep confidential. Personal information you transmit to or receive from this website during a session after you log-in is protected by SSL encryption and a key. Data on the server is stored in a database that we use reasonable efforts to secure. In addition, you will be automatically logged off of this site if no activity occurs during a 30-minute time period.

How Information Is Collected

In general: Unless you provide personally identifiable information to us voluntarily and except for online session information that is collected by means of "cookies" in the manner described in this Privacy Policy, we do not collect information about you in connection with your use of this website. The personally identifiable information that we may have and which enables us to provide our services to you includes, for example, your name and contact information, account information and benefit payment activity, and other employee benefit information and activity.

Use of "cookies": A "cookie" is a small piece of information about an Internet session that may be created and placed on a visitor's personal computer when a visitor accesses a website. We use cookies to facilitate easier navigation within the website, to provide a higher level of convenience for the visitor, and for administrative purposes. We do not use cookies for any other purposes. This information is not shared with any other party for any commercial purposes. You can set your browser (e.g. Microsoft Internet Explorer) to notify you when a website attempts to send a cookie. The browser will allow you to decide whether or not to accept the cookie. If you choose to disable cookies in your browser, you may not be able to take advantage of all the features of this, or other websites. Additionally, your Flash player can be set to reject or delete Flash cookies.

How Information Collected Is Used

We respect your right to privacy. Any confidential information (including personally identifiable information) you provide to us via this website is kept confidential. We have also implemented security measures to protect against the loss, misuse or alteration of information stored in our systems and those of any vendors who assist in providing services to support this website. We use the information collected from visitors to this website to address the specific inquiries or requests of those visitors, and to provide better customer service. The information collected also is used to provide a record of communications between us and website visitors, and to

comply with any applicable legal and/or regulatory requirements. In certain circumstances, the information you provide may also be available to human resources, benefits department or the plan administrator to the extent required for benefits administration.

Other Access to Information

Affiliates and Service Providers: Our affiliates, as well as non-affiliated service providers that assist us in meeting your needs, may under certain circumstances receive personal information collected from you as a website visitor. Such information is disclosed only to respond to your inquiries or requests and to enable a service provider to provide services to us. Personal information disclosed to our affiliates will be treated by these entities with the same standards of privacy and confidentiality that we use.

Other Third Parties: We do not transmit any personal information collected through this website to any third-party marketers.

Disclosure of Personal Information: From time to time, we may be required to provide personal information in response to a court order, subpoena or government investigation or as otherwise required by law. We also reserve the right to report to law enforcement agencies any activities that we, in good faith, believe to be unlawful. We may disclose your personal information to government authorities at our discretion. We may release certain personal information when we believe that such release is reasonably necessary to protect the rights, property, and safety of others or ourselves.

Business Transfer: In the event that substantially all of our assets are acquired by one or more third parties as a result of a merger, sale, consolidation or liquidation, your personal information may be among the data transferred to such third party.

Third-Party Websites

This website may contain links to third-party sites. Once you leave this website, we do not receive any of your information you provide on the third party site. We also do not provide any of your information to third-party websites. These third-party sites may have their own privacy policies. You should review the privacy policy of any website before you provide personal or confidential information. We are not responsible for the content of these other sites or any business you transact or information you share with them.

Protection of Social Security Numbers

Our policy is (i) to comply with all laws restricting the use and disclosure of Social Security numbers, (ii) to protect the confidentiality of Social Security numbers, (iii) to prohibit the unlawful disclosure of Social Security numbers, and (iv) to limit access to Social Security numbers to our employees, and in certain cases to non-affiliated parties that provide services to us, based on their responsibilities. To safeguard Social Security numbers, we maintain physical, electronic, and procedural safeguards that are designed to comply with applicable legal standards. Our employees are prohibited from disclosing Social Security numbers for unauthorized purposes.

Right to Change This Privacy Policy

We reserve the right to change or update this Privacy Policy at any time, and will notify users of this website by posting such changed or updated Privacy Policy on this page. Any changes or updates will be effective immediately upon posting to this website.