

## Information about the California Consumer Privacy Act of 2018

This California Privacy Notice supplements the information contained in the Privacy Statement of Newport Group, Inc. and its affiliates (collectively, “we,” “us,” or “our”) and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

### Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
<b>A. Identifiers</b>	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	YES
<b>B. Personal information categories listed in the California Customer Records statute</b> <i>Cal. Civ. Code § 1798.80(e)</i>	A name, signature, SSN, physical characteristics or description, address, telephone number, credit card number, debit card number, a username or email address. Some personal information included in this category may overlap with other categories.	YES
<b>C. Protected classification characteristics under California or federal law</b>	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
<b>D. Commercial information</b>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
<b>E. Biometric information</b>	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES
<b>F. Internet or other similar network activity</b>	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	YES
<b>G. Geolocation data</b>	Physical location or movements.	NO
<b>H. Sensory data</b>	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
<b>I. Professional or employment-related information</b>	Current or past job history or performance evaluations.	YES

<b>J. Non-public education information</b> <i>Per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)</i>	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
<b>K. Inferences drawn from other personal information</b>	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

**Personal information does not include:**

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

**We obtain the categories of personal information listed above from the following categories of sources:**

- Directly from our clients or their agents.  
*For example, from documents that our clients provide to us related to the services for which they engage us.*
- When you open an account or an account is opened on your behalf by your employer.
- When you make a distribution from your account or make or change an investment choice.
- Directly and indirectly from activity on our website (www.newportgroup.com).  
*For example, from submissions through our website portal or website usage details collected automatically.*
- From third parties that interact with us in connection with the services we perform.  
*For example, from service providers that we engage to provide services.*

**Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided.  
*For example, to process transactions, maintain your accounts, meet requirements with insurance carriers.*
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, regarding transactions or activity related to your account.
- To carry out our obligations and enforce our rights arising from any contracts entered into between us and you or your employer and us.
- Product development, including to develop and improve our products, services, and website, and to present its contents to you.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To respond to state and federal regulatory requests or investigations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter into a written contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- **Category A** Identifiers
- **Category B** California Customer Records personal information categories
- **Category C** Protected classification characteristics under California or federal law
- **Category E** Biometric Data
- **Category I** Professional or employment-related information

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates
- Service providers
- Non-affiliated third-party insurance carriers that provide insurance policies and services

In the preceding twelve (12) months, we have not sold any personal information.

## Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage. When we make changes to this privacy notice, we will post the updated notice on our website and update the notice's effective date. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

## Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please contact us at:

**Phone:** 888-913-3600

**Website:** [www.newportgroup.com/contact/privacy-policy-inquiry](http://www.newportgroup.com/contact/privacy-policy-inquiry)

**Postal Address:**

Newport Group  
300 Primera Blvd., Suite 200  
Lake Mary, FL 32746  
Attention: Enterprise Risk Management Department