

## Wespath Privacy Notice

*Last Updated:* [May 1, 2025]

As the custodian of our clients' data, Wespath is committed to protecting the Personal Information (defined below) of our participants and institutional clients. This Privacy Notice ("Notice") applies to any Personal Information that is shared with Wespath while providing our products or services to you ("Services") and through our website and mobile applications (collectively, "Site"), as well any Personal Information we collect from other sources, including when you apply for a job with Wespath. This Notice is a statement of our practices and your rights regarding your Personal Information.

Throughout the Site, "Wespath" refers to Wespath Benefits and Investments, as well as the organization formerly known as the General Board of Pension and Health Benefits of The United Methodist Church, Incorporated in Illinois and its affiliate the UMC Benefit Board Inc.

By accessing or using Wespath's Site and Services, or contacting us, you acknowledge that you have read, understood, and agree to the practices as described in this Notice.

### Personal Information Collected by Wespath

Wespath collects several categories of Personal Information from and about users of our Site and Services. "Personal Information" means information that uniquely identifies, relates to, describes, or is reasonably capable of being associated with or linked to you. The categories of Personal Information we collect may include:

- *Identifying and Contact Information* – If you register for an account, submit an inquiry, or provide information on or through our Site, we may collect Personal Information to identify and contact you if needed, including your name, last four digits of your Social Security number, mailing address, email address, and phone number. Because our Services involve handling sensitive information related to health, retirement and other benefit plans, as well as financial and investment details, this information may be necessary to verify your identity and preserve account security.
- *Commercial Information* – If you submit an inquiry, or provide information on our Site, we may collect commercial information including information about your plans, investments, and Services you have shown interest in.
- *Usage Information* – When you use our Site, we may automatically record information, including your Internet Protocol address (IP Address), geolocation of your device, browser type, referring URLs (e.g., the website you visited before coming to our Site), domain names associated with your internet service provider, and any other information regarding your interaction with our Site.
- *Employment Information* – If you apply for employment with us, we will collect Personal Information related to your potential employment, including your education and employment history, address and contact information, demographic information, and any other information included in your resume or application.

- *Communication Information* – We may collect Personal Information contained within your communications with us via email, online or paper forms, or verbally when contacting our organization via telephone.
- *Financial Information* – We may collect financial information, such as credit card details, financial account details, etc., that you provide when you use our Services.

## How We Collect Personal Information

- *Directly From You* – We collect Personal Information that you provide to us directly, for example, if you choose to contact us, request information from us, sign up to receive updates, or otherwise utilize our Site and Services.
- *From Third Parties* – We may collect Personal Information from third parties, including but not limited to business partners, advertising networks, social networks, data analytics providers, mobile device providers, internet or mobile service providers, recruiters and job application portals, and background check providers.
- *Through Online Tracking Technologies* – We use cookies and similar technologies to collect Personal Information automatically as you navigate our Site. For additional information regarding our use of these technologies, see the *Cookies and Other Tracking Technologies* section below.

## How We Use Personal Information

- *To provide and personalize our Site and Services*, such as processing transactions, providing and personalizing our Services, processing payments, providing customer service, maintaining or servicing accounts, verifying customer information, creating and maintaining business records, verifying eligibility, and undertaking or providing similar services.
- *To optimize, improve and maintain our Services*, including understanding how users interact with our Site and Services, gauging user interest in certain services and Site functionality, and troubleshooting problems.
- *For marketing and advertising*, including using your Personal Information to send you messages, notices, newsletters, surveys, promotions, or event invitations about our own or third parties' goods and services that may be of interest to you. You can also unsubscribe from any marketing emails or text messages that we may send you by following the instructions included in the email or text correspondence or emailing us at [contact-us@wespath.org](mailto:contact-us@wespath.org).
- *For communicating with you*, such as responding to your questions and comments or notifying you of changes to our Site or Services.
- *For legal, security or safety reasons*, such as protecting Wespath's and our users' safety, property, or rights; complying with legal requirements; enforcing our terms, conditions and policies; detecting, preventing and responding to security incidents; and protecting against malicious, deceptive, fraudulent or illegal activity.
- *As part of a corporate transaction*, such as in connection with the restructuring of part or all of our assets, or the acquisition of part or all of another organization or another organizations' assets, or another transaction, including bankruptcy.
- *To fulfill any other purpose for which you provide it*, including purposes described when you provide your Personal Information or give your consent.

If you are applying for employment with Wespath, we also use Personal Information to process your job application, and to verify the information you have provided in your application, conduct interviews, perform background and reference checks, communicate with you and answer your questions, confirm your eligibility for employment, and improve our recruiting processes. We may also save your Personal Information for future employment opportunities with us.

### **How We Disclose Personal Information**

We may disclose your Personal Information in the following circumstances:

- *Employees and Other Personnel* – We may share Personal Information with our employees and personnel who have a need to know the information for our business purposes.
- *Service Providers* – We disclose your Personal Information to third-party service providers as necessary to enable them to support our Services, Site or other aspects of our business.
- *Affiliates and Subordinates*– We may disclose your Personal Information to the Wespath family of affiliates or subordinates for their and our business purposes and for marketing purposes, including to provide you information about the products or services we think may interest you.
- *Legal Obligation or Safety Reasons* – We may disclose Personal Information to a third party when we have a good faith belief that such disclosure of Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process or enforceable governmental request, (b) enforce or investigate a potential violation of any agreement you have with us, (c) detect, prevent or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property or safety of Wespath, its employees and clients, or the public against harm.
- *Merger or Change of Control* – We may disclose Personal Information to third parties as necessary if we are involved in a reorganization involving a change of control in our business, including but not limited to, a bankruptcy or similar proceeding. Where legally required, we will give you notice prior to such disclosure.

### **Cookies and Other Tracking Technologies**

Wespath and our service providers may use cookies and similar technologies to collect usage and browser information about how you use our Site. The technologies we use for this automatic data collection may include cookies and web beacons that permit us to verify system and server integrity and generate statistics around the popularity of certain content. We process the information collected through such technologies, which may include or be combined with Personal Information, to help operate certain features of our Site, to enhance your experience through personalization, and to help us better understand the features of our Site that you and other users are most interested in.

*Site Delivery and Appearance* – We may use third-party providers to enable certain participant interaction opportunities, content delivery (like audio or video), or other service capabilities. Examples include, but are not limited to, the following functionality:

- *Site Analytics* – We utilize analytics services that use cookies and other technologies that collect your Personal Information, to assist us with analyzing our Site traffic and site usage to optimize,

maintain and secure our Site, and inform subsequent business decisions (including, e.g., advertising). These include, but are not limited to, services like Google Analytics. To learn more about how Google uses data, visit [Google's Privacy Policy](#) and Google's page on "[How Google uses data from sites or apps that use our services](#)." You may download the [Google Analytics Opt-out Browser Add-on](#) for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Websites](#).

- *Selling or Sharing Personal Information* – While we do not sell Personal Information in exchange for monetary consideration, we do share Personal Information for other benefits that could be deemed a “sale” or “sharing” under various data protection laws, because they are sometimes broadly defined to include activities such as the delivery of interest-based advertising on websites or allowing third parties to receive certain information, such as cookies, IP address, and/or browsing behavior. We similarly engage in interest-based advertising when we use data about your activities on our Site to serve you ads on websites owned or controlled by third parties. It is in this context that we have provided advertising networks, data analytics providers, social networks, and video sharing platforms with Personal Information such as your IP address, device information, internet and other electronic network activity information, and geolocation information in the last 12 months.

*Cookie Choices* – To manage your preferences with respect to these technologies, you can:

- Customize your browser settings (or operating system settings on your mobile device, if applicable) to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable certain cookies, please note that some parts of our Site may not function properly. These settings may be lost and require reconfiguration if you delete your cookies.
- Block the collection and use of your Personal Information by online platforms and ad tech companies for the purpose of serving interest-based advertising by visiting the opt out pages of the self-regulatory programs of which those companies are members: [National Advertising Initiative](#) and [Digital Advertising Alliance](#) (or the [European Interactive Digital Advertising Alliance](#), if you are located in the European Economic Area). Please note that even if you opt out of interest-based advertising, you may still see “contextual” ads which are based on the context of what you are looking at on the websites and pages you visit.
- Review and execute any provider-specific instructions to customize your preferences or opt-out of certain processing, including interest-based advertising, by third-party service providers. For example, to opt-out of this type of advertising by Google, customize your ad preferences, or limit Google's collection or use of your data, visit [Google's Safety Center](#) and [Google's Ad Settings](#) and follow [Google's personalized ad opt-out instructions](#).

### What Wespath Does About Children Visiting This Site

We will not knowingly collect or solicit any Personal Information from children, as defined under applicable law, without verified written parental consent. If we learn that we have collected Personal Information from a child, we will promptly take steps to delete that information. If you believe we might have any Personal Information from or about a child, please call Wespath at **1-800-851-2201** or reach out to us via our online [contact form](#).

## How Long Wespath Retains Your Personal Information

We retain your Personal Information for as long as needed to: (i) conduct business with you; (ii) fulfill the purposes outlined in this Notice; and (iii) comply with our legal obligations, resolve disputes and enforce any agreements.

Criteria we will use to determine how long to retain your Personal Information includes the nature and length of our business relationship with you; our legal rights, obligations, and retention requirements; and if we have an ongoing business purpose for retaining your Personal Information, such as communicating with you about ongoing or prospective Services you requested.

## How Secure is my Personal Information?

Wespath has implemented commercially reasonable measures to protect your Personal Information from accidental loss and from unauthorized access, use, alteration, disclosure or destruction. Unfortunately, the transmission of information via the internet is not completely secure. Despite these efforts to store Personal Information in a secure environment, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems.

## Links to Third-Party Websites

Our Site provides links to third-party websites that we do not operate, control or maintain. The third parties operating those websites have their own privacy practices and policies, and Wespath is not responsible for their actions. For example, our Site links to the [EY Navigate](#) website maintained by Ernst & Young. Its Privacy Policy may be found [here](#). Our Site also links to YouTube to display informational videos about our Services. For more information about how YouTube collects and processes Personal Information, please see the [privacy policy on the YouTube website](#). We urge you to read the privacy policies of all third-party websites and third-party advertisers to learn more about their privacy practices and policies.

In some cases, we offer links to social media platforms [e.g., LinkedIn, Facebook, Instagram, X (formerly known as Twitter) and YouTube] that enable you to easily connect with Wespath or share information on social media. Any content you post via these social media pages is subject to the Terms of Use and Privacy Policies for those platforms.

## California Shine the Light Notice

Under California Civil Code Section 1798.83, individual customers who reside in California and who have an existing business relationship with Wespath may request information about our disclosure of certain categories of Personal Information to third parties for the third parties' direct marketing purposes, if any.

To make such a request, send an e-mail with the subject heading "California Privacy Rights" to [contact-us@wespath.org](mailto:contact-us@wespath.org) or write to us by post at: Wespath, 1901 Chestnut Ave., Glenview, IL 60025. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

## Individuals in the European Union, European Economic Area, United Kingdom and Switzerland

This section provides additional information regarding Wespath's processing of Personal Information of people located in the European Union ("EU"), European Economic Area ("EEA"), Switzerland and the United Kingdom ("UK") in accordance with the EU Data Protection Regulation, UK Data Protection Regulation, and the Swiss Federal Data Protection Act.

### *Legal Basis for Processing*

We collect and process Personal Information about you where we have a legal basis for doing so. Our legal basis for processing Personal Information depends on the Personal Information involved and the context in which we process it. Where Wespath acts as a controller, we process your Personal Information: with your consent; where necessary to perform a contract; to comply with our legal obligations; and where doing so is in our legitimate interests (including the purposes described in this Notice) and such interests are not outweighed by your rights and freedoms.

### *Special Category Data*

Wespath only collects Special Category Data where we have a lawful basis for doing so that is permitted under Article 9 of the General Data Protection Regulation (GDPR), specifically within the employment benefits context. We may collect data that reveals your racial or ethnic origin, trade union membership, sexual orientation, or health to fulfill our obligations, exercise our rights, and otherwise administer our employment benefits relationship with you. Please refrain from sending Wespath any Special Category Data outside this employment benefits context.

## Transfers to Third Parties and Countries

Where permitted by applicable law, we may transfer the Personal Information we collect about you to the United States and other jurisdictions that may not be deemed to provide the same level of data protection as your home country, as necessary for the purposes set out in this Notice.

### *For individuals in the European Union, European Economic Area, Switzerland and United Kingdom:*

Wespath will only transfer Personal Information to third parties located outside of this region when it has ensured appropriate safeguards for such Personal Information through use of the standard contractual clauses or other lawful and approved methods.

## Your Privacy Rights and How to Exercise Them

Depending on where you live, you may have the following rights with respect to your Personal Information under applicable data protection laws:

- *Access* – The right to know what Personal Information we have collected about you and to access such Personal Information.
- *Data portability* – The right to receive a copy of your Personal Information in a portable and readily usable format.
- *Deletion* – The right to delete your Personal Information that we have obtained, subject to certain exceptions.
- *Correction* – The right to correct inaccuracies in your Personal Information.

- *Opt out of certain processing* – The right to: (a) opt out of the processing of your Personal Information for purposes of targeted advertising, (b) opt out of the sale of your Personal Information; and (c) opt out of the processing of your Personal Information for profiling in furtherance of decisions that produce legal or similarly significant effect concerning you.
- *Objection/Restriction of Processing* – The right to object or restrict us from processing your Personal Information in certain circumstances.
- *Withdraw Consent* – The right to withdraw your consent where we are relying on your consent to process your Personal Information.
- *Lodge a Complaint* – The right to lodge (file) a complaint with a supervisory authority or other regulatory agency if you believe we have violated any of the rights afforded to you under applicable data protection laws. We encourage you to first reach out to us, so we have an opportunity to address your concerns directly before you file a complaint.
- *Opt Out of Marketing Content* – To opt out of marketing emails, please follow the instructions included in the email correspondence. Please note that, even if you unsubscribe from certain correspondence, we may still need to contact you with important transactional or administrative information, as permitted by law.

To exercise any of the privacy rights afforded to you under applicable data protection laws, please call Wespath toll free at **1-800-851-2201** or e-mail us at [contact-us@wespath.org](mailto:contact-us@wespath.org).

You may also initiate any opt outs by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC). We will only honor Opt-Out Preference Signals, including GPC where required by law. If you choose to use an Opt-Out Preference Signal, you will need to turn it on for each supported browser or browser extension you use.

You will not be discriminated against in any way by virtue of your exercise of the rights listed in this Notice, which means Wespath will not deny Services to you, provide different prices or rates for Services to you, or provide a different level or quality of Services to you. Only you, or an authorized agent that you authorize to act on your behalf, may make a request related to your Personal Information.

We must verify your identity before fulfilling your requests, and if we cannot verify your identity, we may request additional information from you. If you are an authorized agent making a request on behalf of another person, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney. We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

We do not charge a fee to process or respond to your requests unless they are excessive or repetitive. If we determine that a request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We may deny certain requests, or only fulfill some in part, as permitted or required by law. If you are not satisfied with the resolution of your request and you are afforded a right to appeal such decision, you will be notified of our appeal process in our response to your request.

### **Policy Updates**

Please note that this Notice may change from time to time. We will post any changes to this Notice on this page. If we make material changes to this Notice, we may notify you of those changes by additional means, for example, by posting a notice on our Site or sending you notification of the revised Notice by e-mail, if you have provided your e-mail address to us.

### **Questions About Our Privacy Notice**

If you have any questions about this Notice or concerns about the way Wespath uses Personal Information, please contact us by calling **1-800-851-2201** or using our [online contact form](#).