

FCMM Privacy Notice

FCMM Benefits & Retirement (FCMM) offers multiple benefit programs serving employers and their employees. FCMM collects data from you and/or your employer that is needed to establish enrollment, administer your account(s), follow legal requirements, and prepare for your or your beneficiary's future benefits within a given program. This notice describes FCMM's policies for collecting your data and how we keep it secure.

What information does FCMM collect?

The data we collect varies depending upon the benefit program(s) in which you participate and may include:

- Name, date of birth, social security number, marital status, address, phone, email
- Employment status, compensation, payroll data, hire date, housing allowance eligibility
- Investment selections, contribution amounts, tax status of contributions, deferral elections
- Account transactions including asset transfers, rollovers, distributions, benefit requests and claims
- Information and verifications related to processing of benefits or other participant requests such as: Beneficiary information, bank account details, statements for other retirement accounts
- Verifications related to changes in personal status or contact information such as: contact information, housing allowance eligibility, employment status, marital status – including divorce and death of spouse, disability status, name changes, and the effective dates of any of these changes.
- Communication between you (or a person you have authorized to speak on your behalf) and FCMM – Including email, phone, mail, and in person communications.
- Website activity: Some of the features accessed via our website may direct the information *you* provide to a third-party service provider in order to utilize the respective feature. Google Analytics is used to collect information about the effectiveness of our website and may include: the time of visit, pages visited, and time spent on website; referring site details; type of web browser and operating system; flash version, JavaScript support, screen resolution, and screen color processing ability; network location and IP address.

Why does FCMM collect this data?

FCMM is considered the Controller of the data we collect. We collect personal information about you to conduct our business, check your identity and comply with laws.

Processing this data is necessary for the purposes of the legitimate interests by FCMM and our third-party service providers. Having this data allows us to answer questions needed to determine your benefits or take certain actions on your behalf. FCMM must have this information to comply with the provisions of the program documents and legal regulations in order to correctly satisfy the terms of our relationship with you.

When processing *special category data*, such as notices of ill health, FCMM may request *explicit consent* from the participant, or when needed, from a third-party that has been pre-authorized by the participant to act on their behalf.

If you have submitted personal information about another person (*ex: spouse*), FCMM will process this data based on the assumption that you obtained their consent for us to do so prior to providing FCMM with their personal information.

What does FCMM do with your data?

Your information may be collected and processed at different times, such as when enrolling in one of our programs, when your data changes, or to administer the operations related to your account. FCMM limits the sharing of information with others and does not sell your information to third-parties.

As the Benefits Board of the Evangelical Free Church of America (EFCA), FCMM has an arrangement with the EFCA to utilize their secure database for establishing accounts and maintaining account data. We also partner with third-parties as necessary to administer your account and/or provide benefits within our different programs. The information shared with these entities is limited to what is necessary to process requests, provide benefits, maintain your account, or to provide access to program features. We require organizations with which we share your information to have privacy standards in place and to use your information only for the limited purpose for which it was shared.

How do you request a correction to your data?

Our goal is to keep participant and employer information accurate and up-to-date. You can access certain information that we collect and maintain by contacting us. You may correct factual errors in your information by calling or sending us a request substantiating the error and offering a proposed correction. To protect your privacy and security, we will take reasonable steps to verify your identity before making corrections.

How long does FCMM keep your data?

FCMM is required by law to keep our books and records available for review by the IRS, this includes participant data. Your information will be kept on file for audit purposes for at least as long as regulatory requirements dictate. Our data retention requirements don't expire upon cancellation or revocation of your account. FCMM must keep participant records on file until all benefits of your account have been paid out AND enough time has passed that FCMM will not be audited on those records. Generally, this means keeping your records for six years after the year your account is terminated.

How does FCMM keep your data secure?

To help prevent unauthorized access, maintain data accuracy, and facilitate the correct use of information, we have put in place physical, electronic, and administrative procedures to safeguard your information. Only authorized employees and representatives are permitted to see and use your information. Those who use your information are required to follow established standards, procedures, and laws. Processed data is stored and maintained electronically within secure databases and/or secure files. Any physical copies of documents related to your account are stored in locked files within the FCMM office.

FCMM is committed to transferring your sensitive data via secure means. FCMM utilizes secure uploads to our third-party service providers. For correspondence from FCMM to our participants, we send communication through fax or a secure file exchange system. FCMM encourages participants to use these same methods when sending us data electronically.