

# NOTICE OF PRIVACY

## For Your Information Only – No Response Necessary

Healthcare Community Securities Corporation and its Affiliates  
HANYS Benefit Services (HBS)  
Strategic Benefit Services (SBS)

On behalf of Healthcare Community Securities Corporation (HCSC) and certain affiliates\*, this privacy document outlines policies designed to maintain the privacy of your nonpublic personal information.

We do not sell any information to third parties. However, to conduct regular business, we do collect and retain certain nonpublic personal information including:

- information reported by you on applications or other forms you provide to us, such as your name, Social Security number, and address;
- information about your mutual fund or annuity transactions with us or our affiliates, such as account balance and transaction activity;
- an address we receive from a third party when you have moved; and
- information (commonly referred to as “cookies”) collected from the Web browser of your personal computer that allows our Web site to recognize your browser.

We may disclose the following kinds of nonpublic personal information about you:

- information we receive from you on applications or other forms, such as your name, address, and Social Security number; and
- information about your transactions with us, our affiliates or others, such as your vested account balance.

We may disclose nonpublic personal information about you to third parties to perform certain services including:

- disclosing your name and address to mail mutual fund-related materials, such as prospectuses, annual reports, amendments, and quarterly account statements;
- disclosing information to a third party (record keeper, trust, and custodian) to process account transactions that you request or authorize; and
- disclosing information in connection with legal proceedings, such as responding to a subpoena.

Information shared with third parties is not allowed to be used for any purpose other than to assist our servicing of your account(s).

If you close your account(s) or we lose contact with you, we will continue to share information in accordance with our current privacy policy and practices.

HCSC will internally safeguard your nonpublic personal information by restricting access to only those employees who provide products or services to you or those who need access to your information to service your account. In addition, we maintain physical, electronic, and procedural safeguards that meet federal and/or state standards to guard your nonpublic personal information.

**Our privacy policy applies to customers that have a direct relationship with Healthcare Community Securities Corporation (One Empire Drive, Rensselaer, NY 12144) and its affiliates. HCSC is a wholly owned subsidiary of Healthcare Association of New York State. If you receive investment services in the name of a third party broker dealer, bank, or other financial service provider, that third party’s privacy policies may apply to you and our privacy policy may not.**

If you have any questions about this privacy policy, please call (800) 388-1963.

\*HCSC does business as its affiliates, HANYS Benefit Services (HBS) and Strategic Benefit Services (SBS).