

McCready and Keene, Inc. Privacy Policy

In the course of providing actuarial, record keeping, and other administrative services for our clients and their retirement and other employee benefit plans, we receive participant information and related financial data from employees and financial institutions in connection with such plans. This Privacy Policy establishes the following guidelines for how McCready and Keene, Inc. and its employees are to deal with any such information:

1. The use of information is specifically limited to those activities for which we have been employed. Such information will be used to compile reports and other materials, including the processing of plan benefits, as appropriate, in connection with our services to the plan(s) and the participants to which such information relates.
2. Computer files and hard copies containing such information are maintained as deemed appropriate for providing ongoing services to the plans involved in a manner reasonably designed to preserve their confidentiality.
3. The Company has a shredding policy and a contract with a vendor providing shredding and certified disposal services for all materials containing client information. This policy is designed to prevent inadvertent disclosure of client information contained on discarded materials.
4. If the Company learns that any client or participant information is disclosed to a third party without the client's permission, the Company will notify the client of such breach and comply with rules and regulations related to this matter.
5. Our records retention policy generally involves the retention of materials for ongoing clients as long as they are deemed pertinent to those services. Some older records are transferred from time to time to an off-site storage facility maintained by a third party in that business. From time to time, we direct the disposal of certain stored information that is no longer needed in connection with our services. The storage facility has contracted to dispose of such materials in a manner designed to protect the confidentiality of any client information contained in the materials. The storage facility's security procedures also ensure that such stored materials can only be delivered to one of our authorized employees. When a client terminates our services, we will retain records for seven years, and then such records will be disposed of in due course in a manner designed to protect client and participant confidentiality.
6. The names of representative clients may be used with their permission from time to time as references in connection with our efforts to obtain new business, but specific financial information on clients and their plans and participating employees is not used for any purpose other than providing the agreed services to individual clients and is not disclosed to anyone outside the Company, except as required in connection with providing our agreed services or as required by law.
7. Our Employee Manual emphasizes the importance of using client information only in connection with providing our professional services. Employees are prohibited from disclosing client information to anyone outside the Company, except as required in connection with our agreed services.
8. We also will comply with any legal process that might require the disclosure of certain client information. However, it is generally the Company's policy to notify the client before complying with any request for production of documents pursuant to subpoena or in any other legal proceeding.
9. We maintain internal security procedures with regard to our premises and our computer systems to restrict access to any information provided to us so that we can provide services for our clients, including their employees and plan participants. Our policy applies to both active and former clients.