

## Privacy Notice

*Effective Date: 1/8/2026*

Nova 401(k) Associates (“Nova,” “we,” “us,” or “our”) values your trust. Protecting your personal information is an important part of the way we do business. This Privacy Notice explains how we collect, use, share, and protect your information when you interact with us through our website, webinars, events, or when we provide retirement plan services.

This notice does not apply to information we collect about California job applicants and employees. There is a separate policy for California job applicants and employees. For CA job applicants, it can be found within job postings at [greenhouse.com](https://greenhouse.com). For CA employees, the privacy policy can be found with the California notices. Please contact [hr@nova401k.com](mailto:hr@nova401k.com) if you have questions about our privacy policies for employees or job applicants.

This Notice applies to personal information we collect online and offline. It does not cover third-party websites or applications we may link to, or information collected by other parties under their own privacy policies.

We may update this Notice from time to time. If we make material changes, we will revise the “Effective Date” above and post the new version on our website.

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## Information We Collect

We collect different types of information depending on your relationship with us, including:

- **Information you provide directly:** name, email, phone number, employer, job title, plan details, survey responses, or documents you send us.
- **Account and service information:** retirement plan participation details, transactions, balances, and communications.
- **Technical information** (when you visit our website): We do not currently collect technical information when you visit our website. In the future, we may collect IP address, browser type, device information, pages visited, cookies, and similar tracking technologies.
- **Information from other sources:** plan sponsors, advisors, publicly available sources, or service providers as authorized by you or required to deliver services.

We do not knowingly collect personal information from or about children under 13.

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## How We Use Your Information

We may use your information to:

- Deliver and administer retirement plan services.
  - Respond to your requests, registrations, or event participation.
  - Provide education, webinars, and resources.
  - Communicate with you, including marketing (if permitted by law).
  - Improve our services, website, and client experience.
  - Prevent fraud, comply with laws, and maintain security.
  - Conduct internal research and reporting.
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## Information Sharing and Disclosure

We do not sell your personal information. We may share your information with:

- **Service providers and vendors** who perform services on your plan's behalf (e.g., recordkeepers, auditors, financial advisors, trust companies).
- **Service providers and vendors** who perform services on Nova's behalf in connection with your retirement plan.
- **Your employer** as necessary to administer the plan.
- **Plan sponsors, record-keepers, cashout IRA providers, advisors, or your employer** when required to service your retirement plan.
- **Regulators, law enforcement, or legal authorities** if required by law or to protect rights and security.
- **Business partners or affiliates** where necessary for retirement plan administration or joint services.

All third parties are required to use your data only for the purposes outlined in this Notice and to protect it appropriately.

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## Your Privacy Rights

Depending on where you live, you may have rights such as:

- Accessing the personal information we hold about you.
- Requesting corrections or updates.
- Requesting deletion, subject to legal obligations.
- Opting out of certain data uses, including marketing communications.
- Receiving a copy of your data in portable format.

To exercise these rights, please contact us at **privacy@nova401k.com** or 713-524-5192.

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## Data Retention

We retain personal information only as long as necessary to fulfill the purposes described above, comply with legal and regulatory requirements, and resolve disputes. When no longer needed, we securely delete or anonymize your data.

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## Security

We use technical, administrative, and physical safeguards designed to protect your personal information against loss, misuse, and unauthorized access. However, no system can be guaranteed 100% secure.

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## Your Choices

- If we begin using cookies, you can manage cookies and tracking technologies through your browser settings.
- You can unsubscribe from marketing emails by clicking the “unsubscribe” link in the email.
- To the extent that it does not interfere with servicing your retirement plan, you may also request that we limit certain uses or sharing of your data.

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### **California Residents (CCPA Notice)**

If you are a California resident, you may have additional rights under the California Consumer Privacy Act (CCPA), including the right to request access to, deletion of, or opt-out of the “sale” or “sharing” of your personal information. To exercise these rights, please email **privacy@nova401k.com** with “CCPA Request” in the subject line.

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### **Contact Us**

If you have questions about this Privacy Notice or how we handle your personal information, please contact us:

#### **Nova 401(k) Associates**

10777 Northwest Fwy #440, Houston, TX 77092

Email: **privacy@nova401k.com**

Phone: (713) 524-5192

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