

PRIVACY POLICY NOTICE

Pentegra Trust Company ("PTC") serves as trustee or custodian of various accounts and recognizes and respects your privacy concerns as a customer. PTC collects personal information about you in the course of doing business with investors. This "non-public personal information" is personally identifiable financial information about you, which includes, among other items, your address, social security number, account balance information, and purchase and redemption history. The following privacy policy describes the kinds of personal information PTC collects, how it is used, and how it is protected.

INFORMATION WE COLLECT

The information we collect about you generally falls into one of the following two categories:

Personal Information, (all of which you provide to us on account applications and other forms you submit), such as:

- Address
- Date of birth
- Social security number
- Telephone number
- Beneficiary designation
- Copy of driver's license

Transactional Information, such as:

- Investment choices
- Account balances
- Prior transactions

The information we collect about you is used to maintain your account and to process account transactions. As permitted under federal law, we may share the information we collect with affiliated financial service providers, such as Pentegra Distributors Inc., Pentegra Investors, Inc. and Pentegra Services, Inc., respectively.

We may also share the information we collect with unaffiliated companies such as an investment advisor for your account and other unaffiliated companies that are hired to perform accounting administrative and recordkeeping services on behalf of your account (e.g., transaction processing, printing, and mailing services). Lastly, we may share account information with other entities under limited circumstances, such as in response to subpoenas or to protect against fraud.

SAFEGUARDING YOUR INFORMATION

The information we collect about you is always treated as confidential information that has been provided to us solely and exclusively so that PTC can provide trustee and custodial servicing of your account. The unaffiliated companies that we share collected information with are not authorized to use or share this information for any purpose other than to provide PTC with services for which they were hired. Furthermore, PTC policies only allow access to account information by individuals who must have such information in order to service your account. Electronic, physical and procedural safeguards are used to protect account information (including account information of former investors).

Under no circumstances does PTC sell any of the personal information collected in connection with the establishment or maintenance of your account.

Pentegra Trust Company recognizes the importance of safeguarding the non-public, personal information of our accountholders and hope that this description of our privacy policy and practices is reassuring to you. If you have any questions or concerns, please contact our 403(b)/IRA manager, Regina Montrony at (914)-821-9580.

