

## PRIVACY POLICY

As an Account Owner of Scholar's Edge® (the "Plan"), you are entitled to know how we protect your personal information and how we limit its disclosure.

### Information Sources

We obtain nonpublic personal information about our Account Owners and Beneficiaries from the following sources:

- ◆ Applications or other forms.
- ◆ When you create a user ID and password for online account access.
- ◆ When you enroll in our electronic document delivery service
- ◆ Your transactions with us, our affiliates or others.
- ◆ A software program on the Plan's website, often referred to as a "cookie," which indicates which parts of our site you've visited. We use first party and third party cookies.
- ◆ When you set up challenge questions to reset your password online.

If you visit **scholarsedge529.com** and do not log on to the secure account information areas, we do not obtain any personal information about you. When you do log on to a secure area, we will obtain your user ID and password to identify you. We also use this information to provide you with products and services you have requested and assist you in other ways.

We do not collect personal information through the Plan's website unless you willingly provide it to us, either directly by email or in those areas of the website that request information. In order to update your personal information (including your mailing address, email address and telephone number), you must first log on and visit the "My Accounts" section and select the "Account Maintenance" menu for mailing address and telephone numbers and "My Profile" for email address.

If you have set your browser to warn you before accepting cookies, you will receive the warning message with each cookie. You can refuse cookies by turning them off in your browser. However, doing so may limit your access to certain sections of the Plan's website.

We use cookies to help us improve and manage the Plan's website. For example, cookies help us recognize new versus repeat visitors to the site, track the pages visited, and enable some special features on the website. This data helps us provide a better service for the Plan's website visitors.

### Protection of Information

We do not disclose nonpublic personal information about current or former Account Owners and Designated Beneficiaries to anyone, except as permitted by law.

### Disclosure of Information

Copies of confirmations, account statements and other documents reporting activity in your accounts are made available to your financial advisor (as designated by you).

### Right of Refusal

We will not disclose your personal information to unaffiliated third parties (except as permitted by law), unless you, the person who provides the information or the person who is the subject of the information gives express written consent to such disclosure.

### Internet Security and Encryption

In general, the email services provided by the Plan's website are encrypted and provide a secure and private means of communication with us. To protect your own privacy, confidential and/or personal information should only be communicated via email when you are advised that you are using a secure website.

As a security measure, we do not include personal or account information in nonsecure emails, and we advise you not to send such information to us in nonsecure emails. Instead, you may take advantage of the secure features of the Plan's website to encrypt your email correspondence. To do this, you will need to use a browser that supports Secure Sockets Layer (SSL) protocol.

We do not guarantee or warrant that any part of the Plan's website, including files available for download, are free of viruses or other harmful code. It is your responsibility to take appropriate precautions, such as use of an antivirus software package, to protect your computer hardware and software.

- ◆ All transactions are secured by SSL and 256-bit encryption. SSL is used to establish a secure connection between your PC and the Scholar's Edge server. It transmits information in an encrypted and scrambled format.
- ◆ Encryption is achieved through an electronic scrambling technology that uses a "key" to code and then decode the data. Encryption acts like the cable converter box you may have on your television set. It scrambles data with a secret code so that no one can make sense of it while it is being transmitted. When the data reaches its destination, the same software unscrambles the data.
- ◆ You can exit the secure area by either closing your browser, or for added security, you can use the log out button before you close your browser.

### Other Security Measures

We maintain physical, electronic and procedural safeguards to protect your personal account information. Our employees and agents have access to that information only so that they may offer you products or provide services, for example, when responding to your account questions.

### How You Can Help

You can also do your part to keep your account information private and to prevent unauthorized transactions. If you obtain a user ID and password for your account, do not allow it to be used by anyone else. Also, take special precautions when accessing your account on a computer used by others.

**Who We Are**

This joint notice describes the Privacy Policy of OFI Private Investments Inc. and OppenheimerFunds Distributor, Inc. as the Program Manager and Distributor, respectively, of Scholar's Edge. This notice was last updated on March 19, 2015. In the event it is updated or changed, we will post an updated notice on the Plan's website. If you have any questions about this Privacy Policy, write to us at P.O. Box 173691, Denver, CO 80217, email us by clicking on the "Contact Us" section of the Plan's website at **[scholarsedge529.com](http://scholarsedge529.com)** or call us at **1.866.529.SAVE (7283)**.