

## Privacy Policy

Last Updated: March 17, 2026

### Introduction

The Electrical Construction Industry Pension Plan, Electrical Construction Industry Annuity Plan, Electrical Construction Industry Prefunding Credit Reimbursement Program, and Electrical Construction Industry Vacation-Holiday Plan (the “Funds,” “us,” “we,” or “our,” as the context may require) provide **eciplans.com**, **memberxg.gobasys.com/ECIPLANS/main/#!/account/login**, and all other websites that link to this Privacy Policy (collectively, the “Website”).

We respect your privacy rights and feel it is important for you to know how we handle the information we receive from you through the Website. This Privacy Policy (this “Policy”) describes our privacy practices for the Website, including the types of information we may collect from you when you visit or use the Website, and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Website has been developed to provide you with information regarding the Funds along with a convenient and secure online experience to access your member information. This Policy applies solely to information on the Website, and it has been written to give you a clear understanding of our collection, use, and disclosure of data.

Please read this Policy carefully to understand our practices regarding your personal information. By accessing or using the Website, you agree to this Policy and our Terms of Use available at: <https://eciplans.com/wp-content/uploads/2026/03/066077-066078-066079-030097-AGMT-Website-Terms-and-Conditions-2026.pdf>. If our policies and practices are not acceptable to you, please do not use the Website.

This Policy describes and applies exclusively to personal information (as defined below) that we collect on, or in connection with, the Website and in texts, emails, and other electronic communications sent through or in connection with the Website, including when you interact with applications on third-party websites and services, if those applications include links to this Policy. Except as otherwise provided in this Policy or as required by applicable law, this Policy does not apply to information that is collected by any application, website, or third party other than the Website, including through any application that the Website may be available through or that may access, be linked to, or otherwise be accessible from the Website. If you visit an application, website, or third party that we mention or link to, be sure to review its privacy policy before providing it with any information, as that privacy policy will apply to your interactions with that application, website, or third party.

Except as otherwise provided in this Policy, “personal information” means information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you. “Personal information” does not include information which is generally not considered “personal information” under applicable law or is otherwise exempted under applicable law, such as information which is publicly available or subject to special data privacy laws and/or regulations.

This Policy may change from time to time. Your continued use of the Website after we make changes is deemed to be acceptance of those changes, so please check this Policy periodically for updates. The date at the top of this Policy indicates when it was last updated.

### Information Collected

We collect several types of information from and about you as a result of your use of the Website and your communication with us. This information may include:

- Various categories of personal information, including:

- Individual identifiers, such as name, login information, postal address, email address, phone number, birthdate, and Social Security number and other government identifiers;
- Employment and benefit plan information, such as current employment or employment history, employer name or company affiliation, wage information, work email address, work phone number, and benefit plan details;
- Internet or other electronic network activity information, such as information about your internet connection and the equipment you use to access the Website, IP address and other unique device identifiers, your activity on the Website, and other usage details collected through your use of the Website; and
- Inferences drawn from any of the above.
- Any other information, including other categories of personal information not listed above, which you disclose or share; and
- Information that is about you but individually does not identify you, such as information which has been de-identified or aggregated in a manner where it can no longer be used to identify you.

We may collect personal information from any of the following sources:

- On the Website when you provide information about yourself, such as by visiting the Website, using the Website, filling in forms on the Website, registering on the Website, or requesting further information or reporting a problem (for example, name, address, phone number, date of birth, and email address).
- During offline interactions between the Funds and you (for example, discussions with Fund office staff or written communications).
- Automatically as you use and access the Website, such as through cookies, web beacons, and other tracking technologies.
- From third parties, such as third-party service providers we work with to provide services to you.

## Cookies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- **Usage Details.** When you access and use the Website, we may automatically collect certain details of your access to and use of the Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- **Device Information.** We may collect information about your computer and internet connection, including the device's unique device identifier, IP address, operating system, browser type, and mobile network information.

Cookies are one example of a technology that the Website we may use for automatic information collection. A cookie is a small file containing a string of characters that is sent to your browser when you visit a website. When you visit the website again, the cookie allows that site to recognize your browser. Cookies may store unique identifiers, user preferences, and other information, such as what pages you visit, your IP address, or how you arrived on the website. Cookie information allows us to enable certain functions of the Website, to store your preferences and settings, and to analyze your use of the Website and improve your experience. Ultimately, a cookie allows us or a third party to recognize you and make the Website more useful to you.

Cookies can be "persistent" or "session" cookies. Persistent cookies remain on your personal computer or mobile device when you go offline, while session cookies are deleted as soon as you close your browser. You can refuse to accept cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Website, and overall functionality of

the Website may be impaired. Unless you have adjusted your browser setting so that it will refuse cookies, our system may issue cookies when you direct your browser to our Website.

We may also utilize third-party analytics providers, such as Google Analytics, which use cookies and similar technologies to collect and analyze information about use of the Website and report on traffic, usage, and trends. We may use Google Analytics to recognize you and link the devices you use when you visit the Website on your browser or mobile device, log in to your account on the Website, or otherwise engage with us. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, please review Google's site "How Google uses data when you use our partners' sites or apps" located at <https://www.google.com/policies/privacy/partners/>. You can learn about Google Analytics' currently available opt-outs, including the Google Analytics Browser Ad-On, here: <https://tools.google.com/dlpage/gaoptout/>.

### **Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications on the Website may be served by third parties, including service providers and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use the Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see Privacy Choices.

### **How We Use Your Information**

We may use information that we collect about you or that you provide to us, including any personal information:

- To provide you with the Website, all related content, and any other information, products, or services that you request from us.
- To communicate with you, process your requests, and complete transactions.
- To notify you about changes to our Website or any services we offer or provide though it.
- To help maintain the safety, security, and integrity of the Website, as well as our services, databases, and other technology assets.
- To carry out our obligations in administering the Funds, including for billing and collection and enforcing our Terms and Conditions.
- For testing, research, analysis, and development, including to understand our membership and users, and to develop and improve the Website.
- To respond to law enforcement requests and, as required by applicable law, court order or governmental regulations.
- To evaluate, negotiate, or conduct a merger, reorganization, dissolution.
- In any other way we may describe when you provide the information and to fulfill any other purpose for which you provide it.
- For any other purpose with your consent.

### **Disclosure of Your Information**

We may disclose personal information that we collect or you provide as described in this Policy:

- To the Funds' Boards of Trustees or agents.

- To the Funds' programs contracted by the Board of Trustees.
- To contractors, vendors, service providers, advisors, and other third parties we use to support the Funds and their administration and operations, which may include service providers who verify your eligibility or manage your benefits.
- To an actual or prospective successor in the event of an actual or proposed merger, reorganization, or dissolution.
- To fulfill the purpose for which you provided your personal information.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To carry out our obligations in administering the Funds, including for billing and collection and enforcing our Terms and Conditions.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Funds or others.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We do not otherwise sell, trade or transfer your personal information without your consent unless permitted by applicable law. We may use or disclose, without restriction, aggregated information about Website users and information that does not identify any individual.

## Privacy Choices

We strive to provide you with choices regarding the personal information you provide to us. We have gathered the following mechanisms to provide you with control over your information:

- **Accessing, Correcting, and Updating Your Information.** To access and update certain information, you can log in and edit your profile, or you can contact us as provided below. Note that we may not accommodate a request to change information if we believe that the change would violate any law or legal requirement or cause the information to be incorrect.
- **Tracking Technologies; Device Permissions.** You can set your browser to refuse all or some cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, some parts of the Website may then be inaccessible or not function properly. Mobile devices offer permission systems for specific types of device data and notifications, such as phone contacts, pictures, location, and push notifications. You can change your settings on your device to either consent to or refuse the collection or processing of the corresponding information or the display of the corresponding notifications. If you disable or refuse certain permissions, the Website may then be inaccessible or not function properly. Note that the Website does not respond to "do not track" (DNT) signals.

We do not control third parties' collection or use of your information, if applicable, to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt-out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website, <https://thenai.org/opt-out>. Similarly, you can opt-out of receiving targeted ads from members of the Digital Advertising Alliance ("DAA") on the DAA's website, <https://www.privacyrights.info>.

## Security

We implement various physical, technical, and administrative safeguards to protect the security of your personal information both online and offline. The safety and security of your information also depend on you. Where we have given you (or where you have chosen) a username, password, or other access credentials for access to certain parts of the Website, you are responsible for keeping this information confidential. You should not share your access credentials with anyone. To the extent available, you should

activate any additional security measures, such as multi-factor authentication, to prevent unauthorized access to your information.

Please note that the transmission of information via the internet is not completely secure. Although we take reasonable steps to safeguard your personal information, we cannot guarantee the security, confidentiality, integrity, or availability of your personal information transmitted to or within the Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

### **Retention of Personal Information**

We retain your personal information for the longer of: (i) the period reasonably necessary to fulfill the purposes for which the personal information was collected and processed; (ii) the applicable period set forth in our record retention policies; (iii) the period required under applicable law or regulation; (iv) the expiration date or event governing your consent, if applicable; or (v) the date on which we receive the withdrawal of your applicable consent. To determine the applicable retention period for your personal information under (i) above, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of the personal information, the purposes for which we use your personal information and whether we can achieve those purposes through other means.

### **International Personal Data Transfers**

The Website is operated and managed on servers located and operated in the United States, and information collected through the Website as described in this Policy is stored in the United States. As described in this Policy, we may also disclose personal information to other third parties, who may be located in the United States or other countries other than your jurisdiction. If you are accessing the Website from outside the United States, please be advised that the United States and other countries may not offer the same privacy protections as the law of your jurisdiction. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in those other countries may be entitled to access your personal information. By using the Website, you consent to the transfer of your personal information to, and the storage and further processing of your personal information in, the United States and other countries.

### **Children's Privacy**

Our Website is generally not directed to nor intended for use by anyone under 13 years of age (a "Child" or "Children"). We do not knowingly collect personal information directly from Children. If you are a Child, please do not use the Website or provide any information on the Website. If we learn we have collected or received personal information from a Child, we will delete that information. If you believe we might have obtained any information from a Child, please contact us as provided below.

### **Changes to this Policy**

We reserve the right to review and revise this Policy from time to time, without prior notice, subject to applicable legal requirements to provide you prior notice or obtain your consent. The date this Policy was last reviewed and/or revised is noted at the top of the page. You are responsible for periodically visiting this Policy to check for any changes. **Your continued use of the Website following the posting of changes constitutes your acceptance of such changes.**

### **HIPAA Notice of Privacy Practices**

The Electrical Construction Industry Prefunding Credit Reimbursement Program's Notice of Privacy Practices and other privacy policies govern the Electrical Construction Industry Prefunding Credit Reimbursement Program's use and disclosure of, and your rights to access, "protected health information" as that term is defined under the Health Insurance Portability and Accountability Act of 1996 and its implementing regulations. A copy of the Notice of Privacy Practices is available upon request and at

eciplans.com/prefunding-retiree-credit-program. To the extent the terms of this Policy and the terms of the Notice of Privacy Practices conflict, the Notice of Privacy Practices shall control.

### **Plan Documents**

The Boards of Trustees of the Funds have exclusive, full, and complete discretionary authority to interpret the Funds' plan documents and to make decisions with respect to all questions arising in the administration, application, and construction of those documents. In the case of doubt, conflict, discrepancy, or ambiguity between any plan document and any other source of information regarding your benefits (including, but not limited to, information contained in this Policy and otherwise on the Website), the plan document(s), as interpreted exclusively by the Boards of Trustees, shall govern.

### **How to Contact Us**

To ask questions or comment about your personal information, this Policy, or our privacy practices, you may contact us by:

- Our "Contact Us" form at [eciplans.com/contact-us](http://eciplans.com/contact-us);
- Email at [rmilbrath@eciplans.com](mailto:rmilbrath@eciplans.com);
- Phone at 414-778-0068 or 800-338-5291; or
- Mail at ECI Plans, 11001 W Plank Court, Suite 120, Wauwatosa, WI 53226.