

# Privacy Policy

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RS Investments is an independent subsidiary of Guardian Investor Services LLC and the investment advisor to the RS Funds. This privacy policy has been adopted by RS Investments, the RS Funds and Guardian Investor Services LLC ("Guardian").

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## Guardian Corporate Privacy Statement

**At Guardian we value every aspect of our relationship with you, and nothing could be more important to that relationship than maintaining your trust and confidence. We take our responsibility to protect your personal information very seriously. That is why we would like you to be aware of our policies and procedures for collecting, disclosing, and safeguarding the information that our customers and former customers provide to us.**

### We collect customer personal information from the following sources:

- Applications or other forms, such as policies, where we obtain items such as your name, date of birth, etc.;
- Your transactions with us and our affiliates, such as premium payments;
- Consumer reporting agencies and other similar sources relating to creditworthiness; and
- Our Internet websites, where we capture items that you provide when you fill out forms.

### To better serve you, we may disclose without an authorization, both inside and outside Guardian, the information that we collect as described above as follows:

- With affiliates to administer your account, or to give you information about other products and services that may be of interest to you. We may also share non-credit-related information with affiliates to develop marketing programs. We may do this without obtaining prior authorization and law does not allow customers to restrict these disclosures.
- We may also share your information with our affiliates about your transactions and experiences with us, such as payment history.
- With your agent, broker, or representative in order to service your account.
- With non-affiliates in order to administer your account or administer our business. With non-affiliates with whom we have a joint marketing agreement, such as other financial companies, in order to send you information about products and services. We require all non-affiliates to keep your information confidential. We do not share your information with non-affiliates for any reason other than those stated above.
- We may also share your information if the law permits or requires sharing.

Certain disclosures may require us to allow you to "opt-out". If we are considering making a disclosure that triggers your right to opt-out, we will allow you to do so before your information is shared.

### Confidentiality and Security

Access to your personal information is restricted to only those Guardian employees who need it to perform the services required of your account. We have physical, electronic, and procedural safeguards that comply with applicable federal and state regulations to keep your personal information safe. If you decide to end your relationship with a member of the Guardian Corporate Family, or if your account or policy becomes inactive for some other reason, we will continue to treat and safeguard your information as described in this statement.

Any health information collected by us requires you to complete a separate authorization. We will not disclose your health information to anyone without your authorization, unless the law permits or requires us to do so.

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## Confidentiality and Security (continued)

The accuracy of your information is important to us. You have the right to access and to seek correction to your information. You also have the right to request a record of any subsequent disclosures of your information. You may contact us at the address below to receive more information regarding these rights or to receive a more detailed explanation of our privacy policies.

**The Guardian Corporate Family includes:** The Guardian Life Insurance Company of America; Berkshire Life Insurance Company of America; Guardian Investor Services, LLC; The Guardian Insurance and Annuity Company, Inc.; Park Avenue Life Insurance Company and affiliates; Managed DentalGuard, Inc.; Innovative Underwriters, Inc.; First Commonwealth, Inc.; Hanover Acquisition LLC; Park Avenue Securities LLC; and RS Investment Management Co. LLC.

**Information about Securities Investor Protection Corporation (SIPC):** Park Avenue Securities LLC is registered with the US Securities & Exchange Commission as a broker/dealer and investment adviser and is a member of the Financial Regulatory Authority (FINRA- [www.finra.org](http://www.finra.org)) and SIPC. To obtain information about SIPC, including a brochure, please contact SIPC directly at [www.sipc.org](http://www.sipc.org) or at (202) 371-8300.

## Member FINRA and SIPC

Visit [www.GuardianLife.com](http://www.GuardianLife.com) and click on the "Privacy Policies" link at the bottom of the home page for more information on the Guardian Privacy Policy.

**The Guardian Life Insurance Company of America Privacy Office**, P.O. Box 780, Cooper Station, New York, NY 10276-0780.

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