



## **BUSINESS CONTINUITY PLAN**

### **SUMMARY DISCLOSURE**

#### **Information Only - No Response Necessary**

At Transamerica Retirement Solutions, ensuring the continued operation of our business in the event of a significant business disruption or disaster is very important to us as well as to our customers. Accordingly, Transamerica Retirement Solutions has in place a Business Continuity Plan to address business contingencies and disaster recovery. This statement is a summary of our Business Continuity Plan and it discloses the existence of back-up facilities and arrangements and it addresses how we plan to respond to events of varying scope. By providing this statement to our customers, we hope they acquire an understanding of our procedures designed to enable the continuous and reliable delivery of services if an unexpected disruption of our business occurs.

#### **Key Elements of the Business Continuity Plan**

The following briefly describes the key elements of the Business Continuity Plan (the "Plan"):

- ◆ **Enterprise Command Structure:** The Plan provides for a Command Center, consisting of our senior management, to track and communicate the status of interrupted business and to manage recovery efforts. The Command Center has direct link to the Enterprise Command Center, which coordinates Plan efforts at our parent company level.
- ◆ **Business Impact Analysis:** As an operating business, we conduct a Business Impact Analysis on a regular basis to inventory our business processes. There are also procedures for identifying changes in our operational, financial, and credit risk exposures.
- ◆ **Data Back-up and Recovery:** An Information Security Program exists to ensure the secure collection and storage of data (including our books and records) and to control access to such data. Data and other records are reproduced and stored on back-up tapes and sent offsite daily. In the event of destruction or corruption of information databases, they can be quickly reconstructed and restored.
- ◆ **Mission Critical Systems:** Mainframe and internet applications are recoverable using backup and restore procedures at a recovery site. Distributed server-based applications are recoverable using backup and restore procedures at a location maintained by a disaster recovery service provider. Dual load-balanced call centers located in New York, Florida and Iowa are capable of handling all incoming phone traffic. Printing and fulfillment are recoverable at an alternative location made available by a printing and fulfillment service provider.
- ◆ **Alternate Communications between the Firm and Customers, Employees and Regulators (including Regulatory Reporting):** The Plan provides for an assessment of which means of communication are still available during a business disruption or disaster and to arrange for alternate means of communication if necessary or appropriate. Such alternate means may include telephone, e-mail, our Web site, fax, U.S. mail, and in person. With respect to communications with employees, a call tree (which is departmentally based and includes all staff home, cellular and office phone numbers) may be employed. With respect to communications with our regulators, contact information have been filed with various regulators and we may, during a business disruption or disaster, retain legal representatives or other authorized parties to communicate on our behalf and/or file regulatory reports.
- ◆ **Alternate Physical Location of Employees:** In the event of a business interruption or disaster that affects the availability of a primary physical location, the Plan provides for the location of critical staff at an unaffected physical location or an alternative business resumption site maintained by a disaster recovery service provider.
- ◆ **Critical Business Constituents:** We have contacted our critical business constituents (businesses—e.g., our fund custodian and printing and fulfillment vendor—with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical business

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services), and determined the extent to which we can continue our business relationship with them in the event of a business disruption or disaster. The Plan calls for the establishment of alternative arrangements if a critical business constituent can no longer provide the needed goods or services because of a business disruption or disaster affecting either party.

- ◆ **Customers' Access to Funds and Securities:** With respect to variable investment vehicles that we make available to our customers, we generally do not maintain actual custody of customers' funds or securities, which may be maintained at our critical business constituents (discussed above). In the event that we determine that we—or our critical business constituents who may be maintaining customer funds or securities on our behalf—are unable to continue business operations, information regarding how customers may access their funds and securities will be made available if the customary access means—e.g., mail, telephone, secure website, etc.—are unavailable or otherwise adversely impacted.

### **Events of Varying Scope and the Planned Response**

The following lists the types of events we consider and briefly describes our planned response to each:

- ◆ **Critical System or Technology Disruption:** We have designed our critical information systems to withstand minor disruptions, such as equipment failure, through the use of redundant equipment, telecommunications facilities and backup electrical power. We store copies of critical records at an off-site location where they can be retrieved in case information is lost or destroyed. If a significant event, such as a fire or tornado, damaged our technology facilities and rendered them inoperable, we have agreements in place which provide alternate computing facilities and equipment where we can resume our critical operations. Our most critical systems can be recovered within 24 to 48 hours while less important systems would be restored over a period of 3 to 5 days.
- ◆ **Single Facility Disruption:** In the event our offices become unusable, we have space in another location where we can move our operations. This facility is configured with enough furniture and office equipment to support our critical business processes. Telephone service would be rerouted to this alternate facility to restore communications with our customers and business partners. Emergency operations would be established within 24 to 48 hours following an event.
- ◆ **Business District/Metropolitan/Regional District Disruption:** If a natural disaster or other widespread business disruption occurs, it may not be possible to resume operations using local facilities. In such a significant event, we plan to provide only our most critical services, such as ensuring you access to

your account, by establishing emergency operations at an alternative location. Our goal is to have critical services available within 48 hours.

### **Updates and Periodic Review of the Plan**

The Plan will be updated whenever there is a material change to our operations, structure, business or location. We review the Plan at least annually to modify it for any changes to our operations, structure, business or location. We also periodically test the Plan for effectiveness.

### **Companies to Which the Plan Applies**

The Plan applies to Transamerica Retirement Solutions Corporation, Transamerica Retirement Advisors, Inc. and the following affiliates with respect to the pension funds, retirement products, and recordkeeping and administrative services offered by Transamerica Retirement Solutions to its plan sponsor clients and other customers: Transamerica Investors Securities Corporation (TISC), Massachusetts Fidelity Trust Company (MFTC), Transamerica Life Insurance Company (TLIC), Transamerica Financial Life Insurance Company (TFLIC) and this Plan also applies to Transamerica Retirement Insurance Agency, Inc.

### **Cautionary Language Regarding the Plan**

While we have been diligent in our efforts to plan for unexpected events, it is impossible to consider every possible scenario and develop detailed responses to each. We are confident we have addressed the major threats to our business and can continue operating with minimum impact to our customers and business partners. It is possible, however, that in spite of our efforts, our ability to function after a catastrophic event may be adversely impacted by the actions (or failure to act) of third parties beyond our knowledge and control.

The information is provided solely to our customers and no further distribution or disclosure is permitted without our prior written consent. No person other than our customers may rely on any statement herein. Our Plan is reviewed and updated regularly and is subject to change. Please visit our web site at [www.trsrretire.com](http://www.trsrretire.com) for the most current copy of this disclosure or you may request an updated copy by submitting a written request to the attention of the Transamerica Retirement Solutions Information Security Office (ISO) at 440 Mamaroneck Avenue, Harrison, NY 10528. You may also call the phone number that appears on your statement.

*Para recibir estas notificaciones y su estado de cuenta en español, por favor comuníquese con Transamerica Retirement Solutions Corporation. El número gratuito se encuentra en su estado de cuenta.*