



## **Privacy Policy**

Provider takes measures to ensure that the use and disclosure of Client information is consistent with applicable law.

This Privacy Policy explains what personally identifiable information we collect, why we collect it, how we protect it, how we use it, and how and why, in certain cases, we share such information with other parties. Our Privacy Statement may be amended from time to time.

Our Privacy Policy applies to information collected or used when we offer products or services to Client.

### **INFORMATION THAT WE COLLECT AND MAY DISCLOSE**

We collect information in order to comply with applicable laws and to provide the superior level of service that you expect. Personally identifiable information may include: names, addresses, phone numbers or e-mail addresses, social security number; driver's license information; income tax documents for you and your family; bank statements; and investment records.

Specific examples of personal information that we collect and may disclose to affiliates and certain third parties may include:

- Information we receive from you on new account and service request forms.
- Information about your transactions with us, our affiliates, and others such as account balances, payment history, account activity and statements.
- If you visit our Internet web site, [URL] (the "website"), information you may submit to us on our website forms and information we may collect through "cookies" (explained below).

### **HOW WE USE YOUR INFORMATION**

Provider and third-party service providers may work together to provide a variety of services, and they may need to share personally identifiable information received you to maintain an efficient and effective level of service.

The responsible use and disclosure of the personally identifiable information we collect is crucial to our ability to provide you with the services that you expect, and may occur under a variety of different circumstances. For example, we may:

- Use personally identifiable information internally for the purposes of furthering our business, which may include analyzing information we receive from you, matching that information with the information of others, processing services, maintaining accounts, resolving disputes, preventing fraud and verifying your identity.
- Disclose personally identifiable information when required by law, such as requests for personally identifiable information in connection with a judicial, administrative or investigative matter.
- Use and disclose personally identifiable information on an aggregate basis. This means that we may combine parts of your information with parts of the information from our other users without including other identifying components of that



information, such as name, complete telephone number, complete e-mail address or your street address, in the combination.

## **SHARING WITH NON-AFFILIATED SERVICE PROVIDERS**

Provider may disclose personally identifiable information to nonaffiliated service providers who perform business functions on our behalf, which may include marketing of our products and services, check printing, and data processing. Non-affiliated third-party service providers often aid us in the efficient and effective delivery of services and there may be circumstances where it is necessary to disclose personally identifiable information we collect to such parties. However, before we disclose personally identifiable information to a nonaffiliated party, we require them to agree to keep that information confidential and secure and to use it only as authorized by us. Also, we will only share your nonpublic information with non-affiliated third parties, where permitted by applicable law.

Provider does not share, sell, or rent personally identifiable information with outside marketers.

## **HOW WE PROTECT YOUR INFORMATION**

Provider maintains a comprehensive information security program designed to ensure the security and confidentiality of customer information, protect against threats or hazards to the security of such information, and prevent unauthorized access. This program includes:

- Procedures and specifications for administrative, technical and physical safeguards.
- Security procedures related to the processing, storage, retention and disposal of confidential information.
- Programs to detect, prevent, and respond to attacks, intrusions or unauthorized access to confidential information.
- Restricting access to customer information to employees who need to know that information to provide products and services to you, and appointing specific employees to oversee our information security program.
- Employee training programs to ensure that all employees are trained regarding our information security program and the laws applicable to the proper safeguarding and disposal of personal identifying information.
- SMS opt-in consent data, mobile numbers, and personnel information will not be shared or sold to third-parties.

However, Provider cannot and does not guarantee that unauthorized, inadvertent disclosure never may occur.

## **DISPOSAL OF BUSINESS RECORDS**

Provider disposes of all business records containing personally identifiable information in accordance with applicable state and federal laws.

## **COMMUNICATIONS FROM PROVIDER**

Based upon any personally identifiable information you may provide to us, we may occasionally send you some or all of the following promotional communications:

- information on products, services, special deals, promotions



- Provider newsletters

Out of respect for your privacy, we provide you a way to unsubscribe from these communications. Please see the “Choice and Opt-out” section.

In addition, however, based upon any personally identifiable information we receive from you as a result of an account you create or products or services you request from us, we also may occasionally send you some or all of the following:

- service-related announcements, on rare occasions when it is necessary to do so (for instance, if our service is temporarily suspended for maintenance, we might send you an email)
- communications in response to inquiries, service requests, and account management

Generally, you may not opt-out of these communications, which are not promotional in nature. If you do not wish to receive them, you have the option to deactivate your account, subject to any contractual obligations.

## **CHOICE AND OPT-OUT**

If you no longer wish to receive any promotional communications from us, you may opt-out of receiving them by following the instructions included in each newsletter.

## **LOG FILES**

The website gathers certain user information automatically and stores it in log files. This information may include, among other things, internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. This information does not identify individual users. We may use this information to analyze trends, to administer the site, to track users’ movements around the site and to gather demographic information about our user base as a whole.

## **COOKIES**

We use cookies on the website. A cookie is a small file stored on a user’s computer for record-keeping purposes. We do not link the information we store in cookies to any personally identifiable information you submit while on the website.

We may use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. We use session cookies to make it easier for you to navigate our site. A persistent cookie remains on your hard drive for an extended period of time. We may set a persistent cookie to store your passwords, so you don’t have to enter it more than once. We also may use persistent cookies to enable us to track and target the interests of our users and to enhance the experience on the website. You can remove persistent cookies by following directions provided in your Internet browser’s “help” file.

If you reject cookies, you may still use the website, but your ability to use some areas of the website, such as contests or surveys, may be limited.

## **LINKS TO OTHER SITES**



The website may contain links to other sites that are not owned or controlled by Provider. Provider is not responsible for the privacy practices of such other sites. If you have concerns regarding the privacy practices of other sites, you should read the privacy statements available at those sites.

This Privacy Policy applies only to information collected by the website.

### **TRANSFER OF CUSTOMER INFORMATION**

Customer lists and other information provided to us are our business assets. If we merge with another entity or if we sell our assets to another entity, such information, including personally identifiable information provided us, may be included among the assets to be transferred.

### **CHANGES IN THIS PRIVACY POLICY**

We reserve the right to modify this Privacy Policy at any time, so please review it frequently.

If we decide to change our Privacy Policy, we will post those changes on the website so our users and investors are always aware of what information we collect, use and disclose. If at any point we decide to use or disclose personally identifiable information received from you in a manner different from that stated at the time it was collected, we will notify you in writing. We will otherwise use and disclose personally identifiable information in accordance with the Privacy Policy that was in effect when such information was collected.