



## Investnet Privacy Policy

Investnet Asset Management, Inc. and its subsidiaries and affiliates, Investnet Financial Technologies, Inc., Investnet Portfolio Solutions, Inc., Investnet Retirement Solutions, LLC, FDX Advisors, Inc., Folio Dynamics Inc. (doing business as FolioDynamix), Oltis Software LLC (doing business as FinanceLogix), and Tamarac Inc. (collectively "Investnet", or "we" or "our") understand the value of maintaining privacy when handling financial information. Because we respect the privacy of financial information, Investnet ensures the security of consumer personal information in accordance with the following Privacy Policy (the "Privacy Policy").

You (collectively "You" or "Your") utilized the Investnet software, websites, and/or services (the "Services") at the request of Your financial advisor. Alternatively, to use the Services, Your financial advisor, benefit plan sponsor, employer or association has input Your personal information and, if applicable, Your co-client's personal information in order to service financial account(s) on Your behalf, provide You customized financial planning resources, or generally assist You with Your overall financial wellness. These parties and, if applicable, the firm with whom they are licensed, have access to personal information on the Services that You have permissioned them to have. Those parties' use of Your personal information is governed by their or their respective firm's privacy policy. Please contact Your financial advisor if You have questions about their firm's privacy policy.

### Personal Information We Collect

As part of providing a holistic picture of Your financial wellness, Investnet may collect some or all of the following types of personal information:

- Identifiers like postal address, email address, account name, unique personal identifier, login credentials, or other similar identifiers;
- Customer records like a signature, address, telephone number, passport number, Social Security Number, driver's license or state identification card number, insurance policy number, employment, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information as applicable as required to utilize insurance-related tools;
- Classification characteristics like age, marital status, and sex;
- Commercial information such as records of personal property, investment assets, account activity (including transactions, balances, positions and history), anticipated retirement expenses, expected values of future assets such as lump sum distributions from pensions or inheritances, and other purchasing or consuming histories or tendencies (for example, if You opt to share this information in order to view and analyze spending habits and work on budget performance);
- Internet or other similar network activity, like online identifier, Internet Protocol address, web browser, and information on interactions with our products, websites, applications, or advertisements;
- Geolocation data such as physical location or movement of devices, as applicable (for example, if accessing the Services through a voice-activated digital assistant);
- Sensory data, such as customer service requests or questions directed to Investnet through our websites or via telephone conversations;
- Professional or employment-related information, such as current or past job history and income; and
- Inferences drawn from other personal information, such as any additional profile information reflecting preferences and behavior (for example, a person's risk tolerance related to investment strategies).

Personal information does not include publicly available information from government records, publicly available business contact information, de-identified or aggregated consumer information, or

personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, or other laws.

### How We Use Personal Information

Investnet does not sell, rent or lease consumer personal information we collect. In compliance with federal and state laws, we may use consumer personal information for one or more of the following business purposes:

- To fulfill or meet the reason You provided personal information in the first place to us or to Your financial representative on Your behalf;
- To create, maintain, customize and secure Your account;
- To process requests, purchases, transactions and payments;
- To prevent transactional fraud;
- To provide support and to respond to inquiries;
- To personalize and develop experiences with our Services, including offers through our websites, applications, emails, and or text message (with Your consent, where required by law);
- To help maintain the safety, security, and integrity of our Services, databases, other technology assets and business lines;
- For testing, research, analysis and product development, including to develop and improve our websites, products and services;
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Investnet's assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by Investnet about users is among the assets transferred;
- To respond to law enforcement requests and as required by applicable law, court order or governmental regulations;
- As described to You when collecting Your personal information; and
- For the reasons otherwise set forth in this Privacy Policy.

Investnet may develop, use, distribute and publish information and statistics derived from aggregate consumer information and the content that You contribute for use on a masked, aggregate basis.

### A Word About "Cookies"

"Cookies" are small files used by websites to store information on Your computer that provide technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our website. Investnet cookies contain information that identifies You during a session and allows the software to function, to facilitate site navigation, and to personalize Your experience. For the Services to work properly, Your browser must be enabled to accept cookies. Investnet may also use anonymous log file information to: (a) make the websites better, faster and more robust; (b) monitor statistics relating to the websites; and (c) police the websites and enforce the terms of use and any other guidelines for usage.

This information is also not for sale. We do not use cookies to pull data from Your hard drive or view data in cookies created by other websites. Third parties may view, edit, or set their own cookies. The use of these technologies by third parties is subject to their own privacy policies and is not covered by this Privacy Policy, except as required by law.

### Disclosing Personal Information to Others

We do not sell consumer personal information about current or former accounts to third parties. For financial professionals utilizing our technology platform, however, Investnet may make available financial professional business contact information, financial professional profile information and information regarding the use of investment strategies



to third-party investment managers and exchange traded funds, mutual funds and similar investment vehicles.

In compliance with federal and state laws, we may disclose personal information to nonaffiliated businesses for a business purpose. These companies are required to treat Your private information with the same high degree of confidentiality that Investnet does and access Your private information only for the services for which they are engaged. We disclose personal information for a business purpose to the following categories of third parties:

- Investnet corporate affiliates;
- Companies that perform services for us or on Your behalf, including the sub-managers who manage Your assets;
- Financial services companies (such as Your custodian, brokers or dealers) who effect transactions on Your behalf;
- Companies participating with Investnet in a proposed or actual sale, merger, transfer, or business exchange;
- Companies that participate in joint marketing activities with us;
- Non-affiliated parties as allowed by law, such as in responding to a subpoena, preventing fraud, or complying with an inquiry by a government agency or regulator; and
- Other organizations as directed by You or Your representative.

Investnet has disclosed the following categories of personal information for a business purpose in the preceding twelve (12) months: identifiers, customer records, classification categories, commercial information, internet or other similar network activity, geolocation data, sensory data, professional or employment-related information, and inferences drawn from other personal information.

### Retaining Personal Information

Investnet complies with financial laws and regulations to maintain records for statutorily required periods of time. Retaining personal information is often necessary for us and our service provider(s) to:

- Complete the transactions for which we collected the information, provide a requested good or service, take actions reasonably anticipated within the context of our ongoing business relationships, or otherwise perform our contract with You or on Your behalf;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on their relationship with us;
- Comply with a legal obligation, including but not limited to maintaining a books and records requirement under the SEC;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law; and
- Make other internal and lawful uses of that information that are compatible with the context in which the information was provided.

### Protecting Collected Information

We implement physical and electronic safeguards to protect against interception of personal information over the Internet. This includes firewall barriers and authentication procedures to maintain the security of online sessions and to protect Investnet accounts and systems. We use a state-of-the-art secure server to keep all personal information as secure as possible, use transport layer security (TLS) encryption, and regularly assess the effectiveness of our protections against unauthorized access. This approach helps ensure that Your personal information remains safe and private.

### Your Consent

By using the Services, You consent to the collection and use of the personal information described above. Investnet reviews the Privacy Policy annually and reserves the right to amend the Privacy Policy at our discretion and at any time. Should we make a material change to the Privacy Policy, such as collecting additional categories of personal information or adding a materially different, unrelated and incompatible business use of personal information collected, Investnet will provide notice to the effected parties of the change and will post those changes on this page with an updated effective date. Further, this Privacy Policy shall be reviewed on an annual basis for compliance with applicable data privacy laws. Your continued use of the Services following the new effective date constitutes Your acceptance of such changes.

This Privacy Policy constitutes Investnet disclosing to You Investnet's collection, use, and disclosure of personal information for a business purpose over the past twelve (12) months. Under certain laws, consumers may have the right to request to not be included in personal information sold to third parties, often referred to as an "opt out." Investnet does not, however, sell consumer personal information, outside of financial professionals described above. If You have additional questions about the use of Your data, You may reach out to Your financial advisor or contact [Investnet](#) through the "[Contact Us](#)" section.

### International Customers

Our Services are hosted in the United States. If You are an international consumer, note that by providing Your personal financial information, You are: (i) permitting the transfer of Your personal financial information to the United States which may not have the same data protection laws as the country in which You reside; and (ii) permitting the use of Your personal financial information in accordance with the Privacy Policy.