



Investnet Privacy Policy Summary

What personal data we collect. Investnet may receive personal data from you, your representative(s) and other third-party data providers. Investnet may receive some or all of the following types of personal data: (1) Identifiers like postal and email address, account name, unique personal identifiers, and login credentials; (2) Customer records like a signature, telephone number, passport number, Social Security Number, driver's license or state identification number, insurance policy number, bank account number, credit or debit card number, medical information, and health insurance information; (3) Classification characteristics like age, marital status, and sex; (4) Commercial information like property records, investment assets, account activity, anticipated retirement expenses, expected values of future assets, and other purchasing or consuming histories or tendencies; (5) Internet and other similar network activity; (6) Geolocation data; (7) Sensory data such as service requests or questions directed to us; (8) Professional and employment-related information; and (9) Inferences drawn from other personal data.

Why we collect personal data. In compliance with the law, we may use consumer personal data for the following business purposes: (1) For the purpose you or your representative provided it; (2) To create, maintain, customize and secure your account; (3) To process requests, purchases, transactions and payments; (4) To prevent fraud; (5) To provide support and to respond to your inquiries; (6) To provide measurement, analytics and other business services; (7) To personalize and develop experiences with our services; (8) To help maintain the safety, security, and integrity of our services, databases, other technology assets and business lines; (9) To notify you about new functions included in our software; (10) For testing, research, analysis, and product development; (11) To optimize and improve the performance of our products and services in line with customer expectations; (12) To evaluate or conduct a corporate merger, acquisition, divestiture or similar transaction in which consumer personal data is among the assets to be transferred; (13) To respond to law enforcement requests and as required by law, court order or regulation; (14) As described to you at the time of collection; and (15) As 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 deidentified, aggregate basis.

How we share or disclose personal data. Investnet does not sell, rent or lease consumer personal data to third parties. For financial professionals utilizing our technology platform, however, Investnet may make available the professional business contact information, financial professional profile information and information regarding the use of investment strategies to other financial professional users of our services including the third-party investment managers and exchange traded fund companies, mutual fund companies and similar investment vehicles. In compliance with federal and state laws, we may disclose personal data to nonaffiliated businesses for a business purpose, including the following categories of third parties: (1) Investnet corporate affiliates; (2) Companies that perform services for us or on your behalf; (3) Financial services companies such as your custodian, broker or advisor who effect transactions on your behalf; (4) Companies participating with Investnet in a proposed or actual sale, merger, transfer, or business exchange; (5) Companies that participate in joint marketing activities with us; (6) As required by law such as in responding to a subpoena or an inquiry by a government agency or regulator; and (7) Other organizations as directed by you or your representative.

How we protect collected personal data. We implement and maintain reasonable technical and organizational measures designed to safeguard against loss, theft, misuse, as well as unauthorized access, disclosure, alteration or destruction of personal data. While we endeavor to protect personal data in a commercially reasonable fashion and in compliance with applicable laws and regulations, we cannot guarantee the security of personal data transmitted to us or by us.

How long we retain personal data. Investnet complies with financial laws and regulations to maintain records for statutorily required periods of time, otherwise not retaining personal data for longer than is reasonably necessary for the purpose(s) for which the personal data was collected. Personal data may be retained to: (1) 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; (2) Detect security incidents and protect against and prosecute perpetrators of malicious, fraudulent, or illegal activity; (3) Debug products to identify and repair errors; (4) Exercise free speech and ensure the free speech and other legal rights of consumers; (5) Comply with a legal record retention obligation including SEC regulation; (6) Solely internal uses that are reasonably aligned with consumer expectations based on their relationship with us; and (7) Make other internal and lawful uses of personal data that are compatible with the context in which it was provided.

Your rights and choices. Information presented in this Privacy Policy describes our current privacy practices and the categories of personal data we collected and disclosed during the preceding twelve (12) months. You may be entitled, in accordance with applicable law, to request access to, deletion, and portability of your personal data or more information about our information practices. Requests should be submitted to dataprivacyoffice@investnet.com. We will not discriminate against you for exercising your rights, although some of the functionality of and features of Investnet services may change or no longer be available to you. If your personal data is provided by your representative or a third party, we may ask you to work with them in the access, deletion, or portability of your personal data. Investnet's full Privacy Policy is located at <https://www.investnet.com/privacy>.

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