



ENVESTNET PRIVACY POLICY

We Respect Your Privacy

Envestnet Asset Management, Inc. and its affiliates including, Envestnet Portfolio Solutions, Inc., Portfolio Management Consultants, Inc., Portfolio Brokerage Services, Inc., Envestnet Retirement Solutions, LLC, Envestnet Financial Technologies, Inc., Oltis Software LLC, Envestnet Institute, Inc. and Tamarac, Inc. (hereinafter collectively known as Envestnet) understand the value you place on maintaining your privacy when it comes to financial matters. That's why we limit access to customer information to individuals in our organization who need it in order to perform their jobs. Employees who have access to customer information are required to safeguard personal information and keep it confidential.

You do not have to contact us to benefit from Envestnet's privacy protections; they apply automatically to all of our current and former customers.

Security Standards

We safeguard customer information in accordance with established security procedures. We have implemented physical and electronic safeguards to help protect private information from being intercepted over the Internet. We make extensive use of transmission encryption, firewall barriers and authentication procedures to maintain the security of your online session and to protect Envestnet accounts and systems from unauthorized access.

Collecting Information to Serve You

Envestnet collects information about you to help us provide better customer service, better serve your financial needs, offer new products or services, and fulfill legal and regulatory requirements. The type of information that we collect varies according to the products or services you request, and may include:

- Information included on your Client Profile and related forms (such as name, address, Social Security number, date of birth, assets and income);
- Information we receive from you through our Web site or in telephone conversations with you;
- Personal information about your account activity, including your transactions, balances, positions and history. This information allows us to administer your account and provide the services that you have requested;
- Information from your employer, benefit plan sponsor, or association (such as name, address, Social Security number, age and marital status); and
- Placing "cookies" and similar files on your hard drive for security purposes, to facilitate site navigation, and to personalize your experience on our site. We do not use them to pull data from your hard drive, to learn your e-mail address, or view data in cookies created by other websites. We may also collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our Web site.

In addition to personal information that you provide to us, we may receive information about you that you authorize third

parties to provide us. We may also obtain personal information from third parties in order to verify your identity, prevent fraud or to help us identify products and services that may benefit you.

We may use anonymous log file information to (a) make the web-sites better, faster and more robust; (b) monitor statistics relating to the web-sites; and (c) police the web-sites and enforce the terms of use and any other guidelines for usage.

Sharing Information

We do not sell personally identifiable information about current or former clients to third parties. We may share customer information with Envestnet corporate affiliates in order to properly service your account. In compliance with federal and state laws, we may disclose some or all of the information we collect about our customers and former customers, as described above, to nonaffiliated businesses such as:

- Companies that perform services for us or on your behalf, including the sub-managers who manage your assets;
- Companies that participate in joint marketing activities with us;
- Financial services companies (such as your custodian and brokers or dealers) who effect transactions on your behalf;
- Other organizations, with your consent or as directed by your representative; and
- Companies participating with us in a proposed or actual sale, merger, transfer, or business exchange.

These companies are required to treat your private information with the same high degree of confidentiality that we do and only for the services for which they are engaged.

We may also disclose information to 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.

In addition, we may develop, use, distribute and publish information and statistics derived from your data and the content that you contribute for use on a masked, aggregate basis. This particular use of your data and content will not result in the distribution or publication of any personally identifiable information.

For financial professionals utilizing our technology platform, Envestnet may make available your business contact information and information regarding the use of their investment strategies to third-party investment managers and, exchange traded funds mutual funds and similar investment vehicles.

Keeping You Informed

As required by federal law, we will notify you of our Privacy Policy annually. We reserve the right to modify this policy at any time, but we will promptly alert you if we do make any material changes.