

# Privacy

## Investnet Privacy Policy

Investnet Asset Management, Inc. and its subsidiaries and affiliates, Investnet Financial Technologies, Inc., Investnet Portfolio Solutions, Inc., Investnet Retirement Solutions, LLC, Investnet Embedded Advisory, Inc., FDX Advisors, Inc., Folio Dynamics Inc. (doing business as FolioDynamix), MoneyGuide, Inc., QRG Capital Management, Inc., and Tamarac Inc. (collectively “Investnet”, “we,” “us” or “our”) understand the value of maintaining privacy when handling financial information. We present this Privacy Policy (the “Privacy Policy”) which discloses our privacy practices to respect the privacy of financial information and the security of consumer personal information.

### Authorization of Use

Either you who are using this website (collectively with any co-client, “you” or “your”) or your financial advisor, benefit plan sponsor, employer or association (each, your “Representative”) has input your personal information and, if applicable, your co-client’s personal information, into the Investnet software, products, websites, and/or services (the “Services”), to service your financial account(s) on your behalf, provide you customized financial planning resources, or generally assist you with your overall financial wellness. By using our Services, you agree to abide by the following terms and conditions for the Services. Your financial advisor, benefit plan sponsor, employer or association (and, if applicable, the firm with whom they are licensed) shall have access to the Services as you have permissioned them to have in your separate agreements with them. Those parties’ use of your personal information is governed by their respective privacy policy(ies). 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, cookie identifiers and other identifiers that are automatically assigned to your computer or devices when you access the Internet and information on interactions with our Services, other 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).

Investnet may receive the categories of personal information described above from you, your Representative(s), integration partners, government entities and third-party data providers who have the rights to provide us with your information. “Personal information” does not include publicly available information from government records used for the purpose for which the

information was made publicly available, publicly available business contact information, or de-identified or aggregated consumer information.

## **How We Use Personal Information**

Envestnet 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 or your Representative provided personal information in the first place to us;
- 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, including to communicate with you;
- To provide measurement, analytics and other business services;
- To personalize and develop experiences with our Services, including offers through our websites, applications, emails, and or text message, and other platforms (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;
- To notify you about any new functions included in our software or services (with your consent, where required by law);
- For testing, research, analysis and product development, including to develop and improve our Services;
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Envestnet's assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by Envestnet 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.

Envestnet 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.

## **Cookies, Pixel Tags/Web Beacons and Similar Technologies**

We, as well as third parties that provide content, advertising or other functionality to the Services, may use cookies, pixel tags, local storage, and other technologies ("Technologies") to collect tracking and identification information. The Technologies are essentially small data files placed on visitor device(s) that allow us to record how visitors use the Services, which site a user comes from, the number of each user's visits, and how long a user stays on the Services. The Technologies help to improve software function, facilitate site navigation, and personalize your experience of the Services. The use of these Technologies is described in our [Cookie Policy](#) below.

## **Disclosing Personal Information to Others**

We do not sell consumer personal information about a current or former account to third parties. For financial professionals utilizing our technology platform, however, Envestnet 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. We disclose personal information for a business purpose to the following categories of third parties:

- Envestnet corporate affiliates;

- Companies that perform services for us or on your behalf, including the sub-managers who manage your assets and third-party vendors and service providers that provide services to us for a variety of business purposes, such as billing, payment processing, customer service, email deployment, advertising and marketing, security and performance monitoring, maintaining or servicing accounts, processing or fulfilling orders and transactions, verifying customer information, related financial technology functions, research, data hosting, auditing, and data processing;
- Financial services companies (such as your custodian, brokers or dealers) who effect transactions on your behalf;
- Companies participating with Envestnet 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.

Envestnet has disclosed one or more of the following categories of personal information for a business purpose in the preceding twelve (12) months to a party(ies) identified in this section: identifiers, customer records, classification characteristics, 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**

Envestnet 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 maintain security measures to safeguard against loss, theft, interference, and misuse, as well as unauthorized access, disclosure, alteration or destruction of information. We also maintain procedures to help maintain the security of online sessions and to protect Envestnet accounts and systems. This approach helps ensure that information remains safe and private, however, you should understand that no data storage system or transmission of data over the Internet or any other public network can be guaranteed to be 100 percent secure, accurate, complete, or current.

## **Notification of Changes**

By using the Services, you consent to the collection and use of the personal information described above. Envestnet reviews the Privacy Policy annually and reserves the right to amend the Privacy Policy at our discretion and at any time. Should we update the Privacy Policy, we will post those changes on this page with an updated effective date. Your continued use of the Services following the new effective date constitutes your consent to and acceptance of such changes.

## Your Rights and Choices

This Privacy Policy constitutes Envestnet disclosing to you Envestnet's collection, use, and disclosure of personal information for a business purpose over the past twelve (12) months. You may be entitled, in accordance with applicable law, to request access to, deletion, and portability of your information or more information about our information practices. Requests should be submitted via email to [dataprivacyoffice@envestnet.com](mailto:dataprivacyoffice@envestnet.com). We will not discriminate against you for exercising your rights, although some of the functionality and features available on the Services may change or no longer be available to you. If your information is provided by your Representative or a third party, we may ask you to work with them in the removal of your information from the Services. Any difference in the Services or product requested is related to the value provided.

Once we receive your request, we may verify it by requesting information sufficient to confirm your identity. You may be entitled, in accordance with applicable law, to submit a request through an authorized agent. To designate an authorized agent to exercise choices on your behalf, please provide evidence that you have given such agent power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf.

If you have additional questions about the use of your data, you may reach out to your financial advisor or other Representative or contact [Envestnet](#).

## International Customers

Our Services are hosted in the United States. If you are an international consumer, note that by providing your personal information, you are: (i) permitting the transfer of your personal 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 information in accordance with the Privacy Policy.

**Effective Date:** July 26, 2022

## Envestnet Cookie Policy

We, as well as third parties that provide content, advertising or other functionality to the Services, may use cookies, pixel tags, local storage, and other technologies ("Technologies") to collect tracking and identification information. The Technologies are essentially small data files placed on visitor device(s) that allow us to record how visitors use the Services, which site a user comes from, the number of each user's visits, and how long a user stays on the Services. The Technologies help to improve software function, facilitate site navigation, and personalize your experience of the Services. 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, described below.

- **Cookies.** Cookies are small text files placed in visitors' computer browsers to store their preferences. Most browsers allow you to block or delete cookies. If you choose to delete cookies, our Services may not work properly.
- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded within the Services that collects information about how you engage with a web page(s). The pixel allows us to record, for example, which web pages you've visited or advertisements you've clicked. These pixel tags work with cookies to let us know which portions of our Services interest you and help us enhance and develop our Services.
- **Social Media Widgets.** Services may include social media features such as Twitter and LinkedIn widgets. These features may collect your IP address, which page you are visiting from the Services, and may set a cookie to enable the feature to function properly. Your interactions with these features are governed by the privacy policy of the company providing them. We cannot control how these companies use your information. By using these services, you assume the risk that third parties may use the information you provide.
- **Analytics and Internet-Based Advertisers.** We may also use Google Analytics and other vendors to collect information regarding visitor behavior and visitor demographics on some of our services and to remarket to audiences visiting the Services and to develop Services content. For additional information on how Google processes your information and what choices you may have, visit their site [here](#). You can opt out of Google's collection and processing of the data your use of the services generates by going [here](#). We may have similar arrangements with internet-based advertisers that might display ads when you visit our Services. These companies may collect personal and other information about your visits to this and other websites to provide ads about products and services that might be of interest to you. The privacy policies and practices of these third-party providers will govern their use and collection of this information.

Envestnet permits third parties to collect the information from the Technologies and discloses such information to third parties for the business purposes described in this Privacy Policy, including but not limited to providing advertising on our Service and elsewhere based on users' online activities over time and across different sites, services, and devices (so-called "Interest-Based Advertising"). The information practices of these third parties are not covered by this Privacy Policy unless expressly stated otherwise herein.

We use the Technologies as follows:

- **Strictly Necessary.** We use Technologies that are necessary to operate our Services, websites, applications, and tools. This includes Technologies that allow you to access our Services, websites, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity and improve security; or that allow you to use integrations, saved search, or similar functions. The Services usually only set these cookies when you make a specific action, like setting privacy preferences, or logging into the Services. You can set your browser to block or alert you about these cookies, but some parts of the Services may then not work.
- **Performance.** We may use Technologies to assess and improve the performance of our Services, websites, applications, and tools, including to help us understand how our visitors use our Services, determine if you have interacted with our messaging, or determine whether you have viewed an item or link. All information these Technologies collect is aggregated and de-identified.
- **Functional.** We may use Technologies to offer you enhanced functionality when accessing or using our Services, websites, applications, or tools. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content on our Services. If you do not allow these Technologies, then some or all of these services may not function properly.
- **Targeting.** We may use Technologies to deliver content, including ads relevant to your interests, on our Services or on third-party sites. This includes using Technologies to understand whether the advertising you see is useful, such as whether you have clicked on an advertisement. We and our advertising partners may set these Technologies. Our advertising partners may use these Technologies to build a profile of your interests and show you relevant advertisements on other websites.
- **Social Media.** Social media services set these Technologies to enable you to share content with your friends and networks. They are capable of tracking your browser across other sites and building up a profile of your interests. This may impact the content and messages you see on other websites you visit.

## Opting Out of Technologies

By using the Services, you consent to our use of cookies and similar technologies. However, if you would like to opt-out of the Technologies we employ on our Services, websites, applications, or tools, you may block, delete, or disable them through your browser, as applicable:

- Some browsers have options that allow the visitor to control whether the browser will accept cookies, reject cookies, or notify the visitor each time a cookie is sent. Because each web browser is different, please consult the instructions provided by your web browser (typically in the “help” section).
- Some of our third-party partners are members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies. To learn more, please click [here](#) or [here](#).
- Some devices you may use may also have platform controls to make choices about these Technologies. Please note that you must separately opt out in each browser and on each device and that cookie-based opt-outs are not effective on mobile applications.
- Due to differences between websites and mobile apps, you may need to take additional steps to opt out of interest-based advertising for mobile applications. Please check your device settings and mobile app permissions for additional information on how to opt out. You also may stop further data collection from a mobile application by removing it from your mobile device.
- Some mobile and web browsers transmit “do-not-track” signals. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they are even aware of them. We currently do not take action in response to these signals.

If you choose to refuse, disable, or delete these Technologies, some of the functionality of the Services may no longer be available to you and any differences in service are related to the data. Deleting cookies may in some cases cancel the opt-out selection in your browser.

**Effective Date:** July 26, 2022