

Privacy Policy

We understand that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We want you to know what information we collect, and how we use and safeguard that information.

Information We Collect

We collect certain non-public information about you ("Customer Information"). The essential purpose for collecting Customer Information is to allow us to provide advisory services to you. Customer Information we collect may include:

Information that you provide on applications, forms, in written correspondence, or on telephone calls. This Customer Information may include personal and household information such as income, spending habits, investment objectives, financial goals, account statements, and other records concerning your financial condition and assets, employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.

Identifying information such as your name, age, address, etc.

Information about your transactions with us, or others (e.g., broker-dealers, clearing firms, or other investment firms) and your account balances over time. Information we receive from consumer reporting agencies (e.g., credit bureaus), as well as other various materials we may use to provide an appropriate recommendation or to fill a service request.

Information we receive through third-party applications that you use (e.g. search engines, Internet browsers).

How you access and interact with our services ("Usage Information"). This Usage Information is a key part of how we improve your experience and provide you with more personalized insights and recommendations. We and our partners may use various technologies to collect and store Usage Information in connection with our services. These may include things like cookies, browser web storage (e.g., HTML5), web beacons and similar technologies. Please see the Cookies, Analytics and Traffic Data section for more information.

How We Use the Information We Collect

We use the Customer Information we collect from you and third parties to operate our services, communicate with you, conduct research and development to improve or enhance our services and our users' experience, and promote our services. Here are a few examples of what we do with the information:

To create your account and provide the Services to you. We use the information we collect to create and secure your account, and to provide the services to you. To provide application features and to personalize your experience when using our application. The information we collect also helps us tailor our content and improve the way we match you to recommended offers or insights. We're constantly working on ways to better identify and present the information that's most relevant to you.

To communicate with you. We use information we collect to provide you with member support or to send you things like service-related announcements, alerts, recommendations, offers from our partners and other updates or promotions.

Most of the time we'll communicate with you by email, but we may also send you push notifications, browser notifications, or even mail by post.

To conduct research and to improve and promote our services. We use the information we collect to conduct research and to improve or enhance and promote our services.

For legal reasons. We reserve the right to access, use, preserve, transfer or disclose, at any time without notice to you, any information (including Personal Information) as reasonably necessary to:

Comply with any applicable law, regulation, subpoena or legal process, or respond to any governmental requests and cooperate with law enforcement, if we believe such action is required or permitted by law;

Enforce our Terms of Service, including investigating any potential violations;

Protect the safety, integrity, rights or security of our members, our Services or equipment, or any third party; or

Detect, prevent or otherwise address fraud, security or technical issues related to our services or our partners.

Security of Your Information

We restrict access to your non-public personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or provincial standards to protect your non-public personal information.

Information We Disclose

We do not disclose the non-public personal information we collect about our customers to anyone except: (i) to persons necessary to effect transactions and provide the authorized services (such as broker-dealers, custodians, independent managers etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, consultants, etc.); (iii) agents acting on our behalf (e.g. service providers or agents in order to have them perform on our behalf); (iv) our attorneys, accountants, and auditors; or (v) as otherwise provided by law.

We have retained the services of a third-party account aggregation service provider ("Aggregator") to provide us information about client accounts that have been linked through our platform. Aggregator collects Customer Information from third party data sources in connection with the operation of our advisory services. If you link accounts through our platform by inputting your login credentials, Aggregator can (a) use your account information, account access information, and registration information internally to provide and improve Aggregator's services (but not directly for the benefit of any third party); (b) to the extent permitted by law, use, sell, license, distribute and disclose Customer Information and usage information that has been stripped of all personally identifiable information ("Anonymized Data"); and (c) to perform fraud screening, verify identities, and verify the information contained in your accounts for use across the Aggregator network. Aggregator will not disclose your Customer Information to any third-party other than as Anonymized Data, or use your Customer Information to directly solicit you or other customers.

We are permitted by law to disclose the non-public personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose. We only provide these third parties with the minimum information they need to perform their specific function and they are prohibited from using or sharing the information for any other purpose. We also require these third parties to safeguard your information.

Advertising Service Providers

Some of our third-party service providers or partners are advertising networks, marketing partners, publishers and other entities who perform analytics and advertise our products and services on websites not affiliated with us ("Advertising Service Providers"). In connection with these advertising services, we or our Advertising Service Providers, like Google Analytics may use cookies, web beacons, and similar technologies to collect behavioral information about how you use our site or other websites in order to perform tracking and marketing analytics or serve advertisements that are more likely to be of interest to you ("Interest-Based Advertisements"). Our Advertising Service Providers may permit you to opt out of all or some Interest-Based Advertisements on designated websites. For example, many of our Advertising Service Providers participate in the Network Advertising Initiative opt-out program or the Digital Advertising Alliance opt-out program.

Disclosure Regarding Google Analytics Advertising Features

In addition to services from other Advertising Service Providers, we use the following Google Analytics Advertising Features as part of our marketing analytics and advertising: Remarketing with Google Analytics, Google Display Network Impression Reporting, DoubleClick Platform integrations and Google Analytics Demographics and Interest Reporting. We may also use other services provided by Google Analytics from time to time. At present, Google provides users an opportunity to opt-out of the Google Analytics Features through Google's Ads Settings and their web browser opt-out plugin. However, we do not control these opt outs, which may be updated or removed by Google in accordance with its own policies. For additional information on opting out of interest-based ads by Google, you can visit Google's Opt out page [here](#).

Cookies, Analytics and Traffic Data

Cookies are small text files which are transferred from our websites, applications or services and stored on your device. We use cookies to help us provide you with a personalized service, and to help make our websites, applications and services better for you.

Our cookies may be session cookies (temporary cookies that identify and track users within our websites, applications or services which are deleted when you close your browser or leave your session in the application or service) or persistent cookies (cookies which enable our websites, applications or services to "remember" who you are and to remember your preferences within our websites, applications or services and which will stay on your computer or device after you close your browser or leave your session in the application or service).

We use the following different types of cookies:

Strictly necessary cookies. These are cookies which are needed for our websites, applications or services to function properly, for example, these cookies allow you to access secure areas of our website or to remember what you have put into your shopping basket.

Performance cookies and analytics technologies. These cookies collect information about how visitors and users use our websites, applications and services, for instance which functionality visitors use most often, and if they get error messages from areas of the websites, applications or services. These cookies don't collect information that identifies a visitor or user. All information these cookies collect is aggregated and therefore anonymous. We only use these cookies to improve how our website, applications and services work.

Functionality cookies. These cookies allow our websites, applications and services to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. They may also be used to provide services you have asked for. The information these cookies collect may be anonymized and they cannot track your browsing activity on other websites. Targeting or advertising cookies. These cookies are used to deliver advertisements that are more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operators' permission. They remember that you have visited a website and this information is shared with other organizations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organization. Please also see the Advertising Service Providers section above.

Web beacons and parameter tracking. We also use cookies and similar software known as web beacons to count users who have visited our website after clicking through from one of our advertisements on another website or in emails and to collect details of any products or services purchased. These web beacons collect limited information which does not identify particular individuals. It is not possible to refuse the use of web beacons. However, because they are used in conjunction with cookies, you can effectively disable them by setting your browser to restrict or block cookies.

IP Address and traffic data. We keep a record of traffic data which is logged automatically by our servers, such as your Internet Protocol (IP) address, device information, the website that you visited before ours and the website you visit after leaving our site. We also collect some site, application and service statistics such as access rates, page hits and page views. We are not able to identify any individual from traffic data or site statistics.

How to disable cookies. You may be able to configure your browser or our website, application or service to restrict cookies or block all cookies if you wish, however if you disable cookies you may find this affects your ability to use certain parts of our website, applications or services.

Former Clients

If you decide to close your account(s) or become an inactive customer, we will adhere to our privacy policies, which may be amended from time to time.

Changes to Our Privacy Policy

In the event there were to be a material change to our privacy policy regarding how we use your confidential information, we will provide written notice to you. Where applicable, you would be given an opportunity to limit or opt-out of such disclosure arrangements.