



**RoboAdvisor**<sup>TM</sup>

PRIVACY POLICY

Robo Advisor Service Team  
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# RoboAdvisor™

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## ROBO ADVISOR™ PRIVACY POLICY

**Effective: March 30, 2024**

### OUR COMMITMENT TO YOU

Robo Advisor™ (Robo Advisor) is committed to safeguarding the use of your personal information that we have as your Investment Advisor and/or Insurance Agency. Robo Advisor (referred to as "we", "our" and "us" throughout this notice) protect the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account.

Our clients benefit from the information shared within our Robo Advisor™ corporate family. "Our affiliates" are companies with which we share common ownership or control, and which offer insurance, pension, savings, or investment or consumer products. It is important that we can share this information to provide the quality products and services associated with entrusting your financial business with us. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your nonpublic personal information to anyone. Nor does Robo Advisor provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

This privacy policy sets forth details of our approach to privacy and how your personal nonpublic information is collected and used.

### INFORMATION WE COLLECT ABOUT YOU

You typically provide personal information when you complete the paperwork required to become our client. This information may include your:

- Full legal name and address
- Social security or taxpayer identification number
- Identification information
- Family history and current health
- Employment information
- Accounts at other institutions
- Assets, liabilities, and net worth
- Income, tax, expense, and cash flow information
- Insurance and estate planning information
- Investment objectives and risk profile
- Trusted contact person information
- Recent statements of accounts to be replaced

In addition, we may collect nonpublic information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements, and other Subscription and Account Opening Documents.
- Information we receive while establishing a customer relationship including, but not limited to, applications, forms, and questionnaires.
- Information about your transactions with us or others.

## INFORMATION ABOUT YOU THAT WE SHARE

Robo Advisor works to provide products and services that benefit our customers. We may share nonpublic personal information with non-affiliated third parties (such as brokers, insurance companies, and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose nonpublic personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your nonpublic personal information may also be disclosed to you, persons we believe to be your authorized agent, trusted contact person, or representative, and regulators to satisfy Robo Advisor's regulatory obligations and otherwise required or permitted by law.

Lastly, we may disclose your nonpublic personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested. Any organization that receives such information must provide us with a copy of its privacy policy, and each policy will be reviewed to ensure that it is sufficient to meet Robo Advisor's client information privacy standards.

**To repeat, UNDER NO CIRCUMSTANCES whatsoever will Robo Advisor™ sell information about you or your business to anyone public or private.**

## INFORMATION ABOUT FORMER CLIENTS

Robo Advisor does not disclose and does not intend to disclose, nonpublic personal information to non-affiliated third parties concerning persons who are no longer our clients.

## CONFIDENTIALITY AND SECURITY

We restrict access to your nonpublic personal information to those who have a legitimate need to know and only allow disclosures to persons and companies as permitted by law to assist in providing products and/or professional services to you. We maintain physical, electronic, and procedural safeguards in accordance with federal law and regulatory standards to protect your nonpublic personal information.

Our employees are advised about the firm's need to respect our customers' nonpublic personal information confidentiality. Any employee who has access to individual information receives training about and is required to follow company procedures designed specifically to keep that information confidential. These procedures are also designed to ensure that your financial information is accurate, current, and complete. Please notify us if at any time our records contain incomplete or inaccurate information about you. Upon notification from you regarding our records, we will promptly address your concerns and make any necessary corrections.

Additionally, we maintain physical, procedural, and electronic safeguards to protect the information from access by unauthorized parties.

## **WE'LL KEEP YOU INFORMED**

Protecting your privacy is an ongoing process. As technology continues to advance, Robo Advisor™ will continue to evaluate its security standards and procedures associated with protecting your privacy. Nothing is more important to us than our clients' trust and confidence, and we will take whatever steps necessary to maintain the security of our professional relationships. Our policies and procedures for the disclosure of information stated above apply to both current and former customers of Robo Advisor™.

Going forward, we will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of nonpublic personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent information sharing.