

OUR PRIVACY POLICY

MARCH 5TH, 2020

Welcome to Afinitiv. We work hard to protect your personal information and ensure your information is kept private and secure. The following privacy policy outlines the types of personal information that Afinitiv LLC, the relevant custodian and broker dealer collect, including through our website (www.afinitiv.com), or via our investment portal (<https://portal.tradingfront.com/afinitiv>). It also explains why we collect your information and how we use it.

Your privacy is important to us. We will **never** rent or sell your information to anyone. If you have any questions or if you believe that we have not adhered to this privacy policy, please send us a note at team@afinitiv.com.

Information We Collect and Why

In order to meet our legal obligations, procedural obligations and those of custodians and broker dealers, Afinitiv may collect various types of information when you visit the website, any associated mobile app, sign-up as a client, or otherwise engage with us.

Visitor Information

We collect various types of anonymous information about visitors to Afinitiv, such as device-related information (including browser type and IP address) and server log information (including the date and time of day of your visit, average time spent on the our websites, browsing activity, and any site that referred you to us). We also collect information that you input into our website, e.g., by beginning the account application process or by engaging with content on our social media profiles. We use this information to better understand our visitors and our business, facilitate site navigation, provide the services or information you request, and enhance the service we provide.

Customer Information

When you choose to create an account with Afinitiv, we will also collect certain personal information, including your full legal name, email address, permanent address, date of birth, social security number, information about financial status and your responses to an investment questionnaire. We are required by law to collect some of this information before we can provide you with financial services. If you do not wish to provide this information, you cannot become an Afinitiv client.

If you choose to link a bank account when signing up for an account with us, we will collect information about the cash flows into and out of that bank account. You acknowledge and agree that the information you provide to us directly, or via any technology or service provider we select, and by Afinitiv according to this privacy policy.

If you use Zoom to initiate a screen share with any member of our team, including our network of Ambassadors, you acknowledge and agree that Zoom may collect certain information about your location, as well as the timing and your use of its services, in accordance with its privacy policy (located at <https://zoom.us/privacy>).

Other Ways We Collect Information

Apart from through the account opening process and from visitors to the site, we may collect various other types of personal information if you or a friend engages with Afinitiv. We collect your email address as part of our registration process and we may collect other information about you if you follow, connect with, or engagement with the content on our social media profiles. We may also collect personal information if you enter it into our live chat program or contact us or otherwise give it to us (e.g., in an email, phone call, or live chat, or in communication in any form with one of our Ambassadors). Further, we may collect information regarding your browsing activity when you visit any of our websites and actions you take within your account while logged in to your Afinitiv account.

Cookies and Pixels

Cookies are small pieces of data that are stored on your computer, mobile phone or any other device used to access the internet. Pixels are small code blocks on a website that allow for another server to measure viewing of a webpage and often are used in connection with cookies.

We use these technologies to customize and improve your experience with us. Cookies store anonymous information, such as whether you viewed the site from your mobile device. We may store some personal information in a cookie and/or pixel, such as the site that you visited immediately prior to visiting our websites and relevant financial information that allows us to enhance your user experience and for marketing and other analytical purposes. Additionally, we may use a cookie and/or pixel that only stores anonymous information to track visitors across websites or devices to better customize our marketing and advertising campaigns.

Cookies, pixels, and similar technologies are not required for site functionality. You are not required to accept any cookies or pixels to use this site. However, refusing to accept cookies or pixels will make the use of our websites more cumbersome and less accessible.

Advertising Companies

We advertise our services on websites not affiliated with us, and we may contract with third-party advertising companies to display these ads. These third-party advertising companies, along with data exchanges and similar providers, may use cookies and similar technologies to collect technical and web navigational information, such as device type, browser type, IP address, and pages visited. We do not provide any information to these advertising companies that could personally identify our users or clients.

Afinitiv and third-party advertising companies may use the data collected to provide you with ads relevant to you and personalized content while you are on websites or other websites. If you prefer to not receive targeted advertising, you can opt out of some network advertising programs that use your information by visiting the [NAI Opt-Out Page](#). Please note that even if you choose to remove your information by opting out, you will still see advertisements while you are browsing online.

Additionally, many network advertising programs allow you to view and manage the interest categories they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive. The [NAI Opt-Out Page](#) provides a tool that identifies its member companies that have cookies on your browser and provides links to those companies.

Because mobile devices may vary in how they operate and may not use cookies, the choice management options listed above may not work for all mobile devices and mobile apps.

Analytics Services

We use third-party analytics tools, including “Google Analytics” (such tools collectively referred to as “Analytics Services”) to collect information about the usage of our websites. The Analytics Services collect information about how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site, among other information. We use the information we get from these Analytics Services to improve this site.

These Analytics Services collect the IP address assigned to you on the date you visit this site, along with other anonymized information (e.g., browser type and type of device used to visit the site), but not your name or other personally identifiable information. The Analytics Services’ ability to use and share information about your visits to this site is restricted by their terms of use and privacy policies. We do not combine the information collected through the use of Google Analytics with personally identifiable information.

You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser. You can opt-out of Google Analytics by installing the [Google Analytics Opt-out Browser Add-on](#).

How We Use Your Personal Information

Afinitiv uses your personal information to provide financial advice and other financial services; enhance your customer experience; improve our products and features; provide customer support; open, operate, and maintain your account in accordance with US law; investigate and understand how our service is used; monitor and protect the security and integrity of Afinitiv; and better market and advertise Afinitiv's services. You understand and agree that your identifying information may be compared with government-provided lists of suspected terrorists.

As part of this process, we may from time to time include, compile, or aggregate some of your personal information in certain data analysis, reports, or other interpretations of investment trends for both internal and external purposes. When including, compiling, or aggregating personal information for such purposes, we make sure that the information is anonymized such that no particular client is identifiable, to the extent allowed by law.

Additionally, we may use your personal information to contact you regarding our own services, resources, job openings, or other opportunities that we think may be of interest to you. If you no longer wish to receive such marketing communications from us, please click the "unsubscribe" link that can be found at the bottom of each such email message. Please note that if you hold an account with Afinitiv, you cannot opt-out of certain communications related to the administration of your account.

How We Share Your Information

We do not sell, rent, or trade your personal information with any third parties other than with your consent or as required by law.

In order to provide financial services and in connection with our everyday business purposes and activities, your personal information may be shared with third parties who perform services on our behalf. Examples of these third parties and services include consumer identification verification services, custodians, broker dealers, public accounting firms and other professional firms, and certain other vendors and service providers who perform marketing, advertising, research and analytics services on our behalf. Any such information shared will be bound by the privacy policies of those third parties. We may also disclose your information to other third-party financial institutions, e.g., if you ask to transfer assets from Afinitiv to such financial institutions.

We may also disclose personal information in response to service of legal process, such as a court order, summons, or subpoena, or as permitted or required by law when we reasonably believe it is necessary or appropriate to investigate, prevent, or take action regarding illegal activities, suspected fraud (including identity theft), frontrunning or scalping, situations involving potential threats to the physical safety of any person, or suspected violations of our Terms of Service or customer agreements. We also may disclose information about you if necessary to determine your eligibility to recover compensation in connection with class action lawsuits.

Furthermore, we may disclose personal information in specific other cases with your consent.

If you conduct business with us, we may exchange information we collect with other third parties you may authorize, or with others they may authorize.

How Your Personal Information is Protected

We work diligently to protect your personal information. We employ several physical and electronic safeguards to keep your information safe. While copies of your data may be made from time to time and used for various internal and communication purposes, we do not store copies of your data outside of the investment platform other than as may be required by law. We limit access to your personal and financial information to only those employees, affiliates and technology providers with authorized access who need to know the information in order to perform their functions. Furthermore, if you choose to close your account or your account is terminated with us, we will continue to adhere to the privacy policies and practices outlined here. If you maintain an account with us that you access through our websites or any associated mobile apps, you are responsible for protecting and maintaining the confidentiality of your account and password and restricting access to your computer or mobile device.

How You Can Access or Change Your Personal Information That We Have Collected

Once you have registered with Afinitiv, you can access your profile, review the information that is stored, and revise that information. If you have any problems, you may also contact us at team@afinitiv.com. Due to US regulatory requirements, we do not delete residual copies of outdated information and must preserve all customer data for a minimum of three years.

Other Important Information

Former Customers

If you are a former client, these policies also apply to you; we treat your information with the same care as we do information about current clients.

How We Respond to Do Not Track Signals

Online tracking is the collection of data about an individual's Internet activity used to deliver targeted advertisements and for other purposes. Clients using certain modern browsers have the ability to activate a "Do Not Track" signal. Afinitiv does not currently respond to the "Do Not Track" signal.

How You Accept This Policy

By using and continuing to use the Afinitiv websites, associated mobile apps and/or services, or otherwise providing us with personal information (such as an email address) you agree to the terms and conditions of this privacy policy and any updates thereto. This policy may change from time to time. This is our entire and exclusive privacy policy and it supersedes any earlier version. The Terms and Conditions outlined herein take precedence over any conflicting privacy policy provision.

Changes to the Policy

We may modify this privacy policy over time without prior notice by posting a new version of this privacy policy, which it is your responsibility to review. Any changes to the privacy policy will be reflected in an updated Privacy Policy document uploaded to the Legal section of our websites and will become effective immediately upon uploading. We encourage you to periodically review this privacy policy to stay informed about how we are protecting the personally identifiable information we collect. If changes to the privacy policy are material, we will do our best to notify you via email or through a notification on the site or app. Please check the effective date below to determine if there have been any changes since you have last reviewed the our Privacy Policy.

Children

Our service is not directed towards anyone under the age of 18. If a parent or guardian becomes aware that his or her child under the age of 18 has created an account with Afinitiv and/or provided us with personally identifiable information, please contact us at team@afinitiv.com. Additionally, if we become aware at any point that a child under the age of 18 is using our service, we will terminate his or her account.

Your Rights as a California Resident

This notice for California residents supplements the information contained in Afinitiv's Privacy Policy and applies solely to consumers who reside in the State of California. This notice is intended to provide information required under the California Consumer Privacy Act of 2018 ("CCPA") and other California laws. Any terms defined in the CCPA or its implementing regulations have the same meaning when used in this notice. This notice applies to the data collection and processing practices of Afinitiv LLC only.

We do not and will not sell consumer personal information. We also do not offer financial incentives, preferential service agreements, or any other differences in our prices or services in exchange for your data.

Information We Collect

There are eleven categories of personal information described in the CCPA. During the last twelve (12) months, we have collected personal information in the following categories from consumers, although we do not collect every specific piece of personal information for every consumer:

- Identifiers: Name, address, email address, phone number, account identifiers, online identifiers, Social Security number, or other similar identifiers.
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)): Name, signature, Social Security number, address, telephone number, driver's license or state identification card number, employment, employment history, bank account number, and other financial information. This category may overlap with other categories.
- Protected classification characteristics under California or federal law: Age, marital status, or gender.
- Commercial information: Purchasing or consuming histories or tendencies.
- Internet or other similar network activity: Information on a consumer's interaction with our website, applications, or advertisements.
- Geolocation data: Physical location of logins.
- Professional or employment-related information: Current occupation.

We collect personal information:

- Directly from our clients or their agents,
- Indirectly from our clients or their agents and our Ambassadors, in the course of the services that we provide,
- Directly and indirectly from activity on our websites and social media profiles, and
- From third-parties that interact with us in connection with the services we perform.

What is not included in the definition of personal information?

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To provide you with the products and services that you request from us, including financial advice and other financial services.
- To provide you with emails or other communications concerning our products and services, including customer support.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- To enhance your customer experience.
- To improve our products and services.
- To investigate and understand how our services are used, including through testing, research, analysis, and product development.
- To contact you to market our own products, services, resources, or any other opportunities that we think might be of interest to you.
- To maintain your account in accordance with applicable U.S. federal and state law.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To monitor and protect the security and integrity of Afinitiv.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of personal information or use the personal information we collected for materially different or unrelated purposes without notifying you.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we seek to require the third-party recipient 1) not to disclose the information, except as permitted by you, 2) not to sell the information, and 3) not use the information for any purpose except the purposes described our agreement with the third-party recipient.

In the preceding twelve (12) months, we have disclosed the following categories of personal information to third parties:

- Identifiers.
- California Customer Records personal information categories.
- Protected classification characteristics under California or federal law.
- Internet or other similar network activity
- Professional or employment-related information.

We may disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold any personal information. Afinitiv does not sell, rent, or trade consumers' personal information.

Your Rights as a California Resident

The CCPA provides California residents with specific rights regarding their personal information. This section describes consumers rights under the CCPA rights and explains how you can exercise those rights with us.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (a "Request"). Once we confirm your Request, we will disclose to you, upon specific request:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and verify your Request, we will delete (and direct our service providers to delete) your personal information from our (and their) records, unless an exception applies.

Personal information that we collect and use to provide you with financial services, and which Afinitiv is obligated by federal law and/or regulations to retain, cannot be deleted upon request.

We also may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Detect security incidents;
- Protect against malicious, deceptive, fraudulent, or illegal activity;
- Assist law enforcement in prosecuting those responsible for such activities; or
- Comply with a legal obligation.

Exercising Access, Data Portability, and Deletion Rights

To exercise your rights described above, please submit a Request to us by:

- Email, to team@afinitiv.com

Only you or an agent registered with the California Secretary of State who is authorized to act on your behalf may make a Request. You may only make two Requests within a 12-month period. Each Request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your Request with sufficient detail that allows us to properly evaluate and respond to it.

We will not respond to your Request or provide you with personal information if we are unable to verify your identity, or to verify the authority for the person making the request as your agent. We will use personal information provided in a verifiable consumer request to verify your identity or authority to make the request, and not for any other purpose.

Response Timing and Format

We will acknowledge your Request within 10 days. We attempt to respond to every Request within 45 days. If we require more time, we will inform you of the reason and how much additional time we require (up to 90 days in total). Any disclosures we provide may only cover the 12-month period preceding the Request's receipt. If we are unable to satisfy your Request, or a part of your Request, we will explain why.

We do not charge a fee to process or respond to Requests.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you services.
- Charge you different prices for our services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of service.

Changes to Our California Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or by updating this notice on our brochure page.

Your Rights as a Vermont Resident

We do not share nonpublic personal financial information we collect about Vermont residents to non-affiliated third parties except for our everyday business purposes or as otherwise permitted by law. If you wish to revoke any authorization to share your nonpublic personal financial information, which you have provided to us by entering into our Customer Agreement, please contact us at team@afinitiv.com. Please note, however, that we will not be able to provide you with services through Afinitiv without the ability to share this financial information.

International Visitors

This Service is provided principally in the United States. If you are an international visitor, you should 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 this privacy policy.

Contact:

For any questions, please contact us at:

team@afinitiv.com