

## **Privacy Policy**

VestHQ, LLC (“VestHQ”) is committed to keeping any and all personal information collected of those individuals that visit our website and mobile platform and make use of our online facilities and services accurate, confidential, secure, and private. This privacy policy (the “Privacy Policy”) has been designed and created to ensure those affiliated with VestHQ of our commitment and realization of our obligation not only to meet but to exceed most existing privacy standards.

This Privacy Policy shall govern any and all data collection and usage thereof. Through the use of our website/mobile platform and/or services you are herein consenting to the following data procedures expressed within this Privacy Policy.

### **Collection of Information**

VestHQ website and mobile platform collect various types of information, including, but not limited to, the following:

- Voluntarily provided information which may include your name, birth date, address, email address, phone number, Social Security number, compensation, billing and/or credit card information, bank information, financial account numbers and/or balances, etc., which may be used when you purchase products and/or services and to deliver the services you have requested.
- Information automatically collected when visiting VestHQ website and mobile platform, which may include cookies, third party tracking technologies and server logs.
  - VestHQ uses cookies to help us secure your activities and to enhance the performance of our website/mobile platform (cookies are small text files sent from the server to your computer). Cookies used by VestHQ do not contain personal information, including account, PIN, or password information.
  - Cookies also may be placed by third parties when you access their sites through linking from this website/mobile platform. We do not have access to these cookies or any information that these cookies may contain. Contact the third-party site for more information on these cookies. Although we encourage third parties to adhere to appropriate privacy policies and standards, we are not responsible for the actions or policies of such parties.
- VestHQ may have the occasion to collect anonymous demographic information, such as age, gender, household income, political affiliation, race and religion at a later time. We may also gather information about the type of browser you are using, IP address or type of operating system to assist us in providing and maintaining superior quality service.

It is highly recommended and suggested that you review the privacy policies and statements of any website or mobile platform you choose to use or frequent as a means to better understand the way in which other websites/mobile platforms garner, make use of and share information collected.

## **Use of Collected Information**

VestHQ may collect and may make use of personal information to assist in the operation of our website/mobile platform and to ensure delivery of the services you need and request. We may also share your personal information with third parties, such as compliance, plan administrators, third party administrators, plan sponsors, recordkeepers, and custodial partners, strictly for the purpose of serving you as a customer. At times, we may find it necessary to use personally identifiable information as a means to keep you informed of other possible products and/or services that may be available to you from VestHQ. VestHQ may also be in contact with you with regards to completing surveys and/or research questionnaires related to your opinion of current or potential future services that may be offered.

VestHQ does not now, nor will it in the future, sell, rent or lease any of our customer lists and/or names to any third party marketing firms.

VestHQ may deem it necessary to follow websites/mobile platforms and/or pages that our users may frequent in an effort to glean what types of services and/or products may be the most popular to customers or the general public.

VestHQ may disclose your personal information, without prior notice to you, only if required to do so in accordance with applicable laws and/or in a good faith belief that such action is deemed necessary or is required in an effort to:

- Remain in conformance with any decrees, laws and/or statutes or in an effort to comply with any process which may be served upon VestHQ and/or our website/mobile platform;
- Maintain, safeguard and/or preserve all the rights and/or property of VestHQ; and
- Perform under demanding conditions in an effort to safeguard the personal safety of users of VestHQ's website and mobile platform and/or the general public.

## **Children under age of 13**

VestHQ does not knowingly collect personal identifiable information from children under the age of thirteen (13) without verifiable parental consent. If it is determined that such information has been inadvertently collected on anyone under the age of thirteen (13), we shall immediately take the necessary steps to ensure that such information is deleted from our system's database. Anyone under the age of thirteen (13) must seek and obtain parent or guardian permission to use this website or mobile platform.

## **Unsubscribe or opt-out**

All users and/or visitors to our website/mobile platform have the option to discontinue receiving communication from us and/or reserve the right to discontinue receiving communications by way of email or newsletters. To discontinue or unsubscribe to our website/mobile platform please send an email that you wish to unsubscribe to

**hello@vesthq.com**. If you wish to unsubscribe or opt-out from any third party websites, you must go to that specific website to unsubscribe and/or opt-out.

### **Links to other websites**

Our website/mobile platform does contain links to affiliate and other websites/mobile platforms. VestHQ does not claim nor accept responsibility for any privacy policies, practices and/or procedures of other such websites/mobile platforms. Therefore, we encourage all users and visitors to be aware when they leave our website/mobile platform and to read the privacy statements of each and every website/mobile platform that collects personally identifiable information. VestHQ's Privacy Policy applies only and solely to the information collected by our website/mobile platform.

### **Security**

VestHQ shall endeavor and shall take every precaution to maintain adequate physical, procedural and technical security with respect to our offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure or modification of the user's personal information under our control.

### **Changes to Privacy Policy**

VestHQ reserves the right to update and/or change the terms of this Privacy Policy, and as such we will post those change to our website/mobile platform, so that our users and/or visitors are always aware of the type of information we collect, how it will be used, and under what circumstances, if any, we may disclose such information. Our users and visitors agree to be bound by subsequent revisions and agree to review this Privacy Policy periodically for changes. The most updated version of this Privacy Policy will be available for our users and/or visitors' review under "Privacy" link that appears on the VestHQ website and mobile platform.

### **Acceptance of terms**

Through the use of VestHQ website/mobile platform, you are hereby accepting the terms and conditions stipulated within this Privacy Policy. If you are not in agreement with our terms and conditions, then you should refrain from further use of our website/mobile platform. In addition, your continued use of our website/mobile platform following the posting of any updates or changes to our terms and conditions shall mean that you are in agreement and acceptance of such changes.

### **How to contact us**

If you have any questions or concerns regarding this Privacy Policy related to our website/mobile platform, please feel free to contact us at the following email:

Email: **hello@vesthq.com**

Version 1b – July 12, 2018