eMONEY ADVISOR, LLC PRIVACY POLICY

Last Updated: October 2022

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Your privacy is very important to us. This Policy explains how eMoney Advisor, LLC ("**eMoney**", "**we**", "**us**" or "**our**") collects, uses, discloses, and protects personal information through our Sites and our mobile application, "**Incentive**", in connection with our Services. This Policy also tells you about the rights and choices you have with respect to your personal information, and how you can reach us to get answers to your questions. Please note, our privacy practices are subject to the applicable laws of the places in which we operate. You will see additional region-specific terms that only apply to customers located in those geographic regions, or as required by applicable laws. We encourage you to read this Policy as well as the eMoney Terms of Use upon accessing our Services. Additionally, by using our Site, using Incentive, or by registering for any Services, you acknowledge that you have read and understand the terms of this Policy. If you do not agree with (i) this Policy, (ii) any revisions to this Policy, and/or (iii) any practices related to this Policy, or do not use, visit, register, or otherwise access the Sites, any Services, and content contained on the Sites or Services.

Who We Are

eMoney is a leading wealth management technology company that provides comprehensive, scalable financial planning software to financial firms and advisors. Our innovative technologies empower our clients to meet a broad range of planning needs for their customers. We also offer our mobile application called "Incentive" to employers, as well as financial professionals.

What this Policy Covers

This Policy covers the personal information we collect through the online software applications that we own and operate that link to this Policy. Our mobile application called "Incentive" ("**Incentive**", or the "**Mobile App**"), and our websites, www.emoneyadvisor.com, and the informational site about Incentive available at www.getincentive.com (collectively, the "**Sites**"). Together our online software applications, Mobile App, and Sites are referred to as the "**Services**" or the "**eMoney Wealth Management System**".

Defined Terms

An "**Advisor**" is a business customer using eMoney's Wealth Management System (whether a financial advisor, financial institution, broker-dealer, registered investment advisor, third-party administrator, trust company, or family office customer) for the purpose of providing personal, family, or household financial planning services to Customers. "**Customer**" is an individual investor who is a customer of the Advisor, and who is given credentialed access to the Services by the Advisor.

When we use the term "**User**" in this Policy, we mean both Customers and representatives of the Advisor who have credentialed access the Services.

"**Alliance Partners**" are businesses or people that the Customer authorizes to view or access their personal information in the eMoney Wealth Management System, such as a banker, accountant, or attorney retained by the Customer.

When we use the term "**aggregate**," "**aggregated**," or "**aggregation**," we mean a process undertaken at the direction of the Customer to gather information from various sources, such as financial institutions and financial accounts, to be consolidated into the eMoney Wealth Management System and/or the Mobile App. "**Aggregated Customer Information**" is the information that is gathered together into one location through this aggregation process, which still identifies the individual Customer. **Note: This policy also refers to "Aggregated Consumer Information." To avoid confusion, when we use the term, "Aggregated Consumer Information," we are referring to data which has been 'aggregated' as defined by the California Privacy Rights Act ("CPRA"), meaning the information relates to a group or category of consumers, from which individual consumer identities have been removed, that is not linked or reasonably linkable to any consumer or household, including via a device.**

When we use the term "**personal information**", we mean information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, to you. This may include information such as an address, phone number, email address, a username or other online login information; and a financial account, as well as other information (e.g., employment-related or transactional information) when coupled with a person's identifying information.

When we use the term "**financial institution**", we mean a company engaged in the business of dealing with financial and monetary transactions such as deposits, loans, investments, and currency exchange.

When we use the term "**financial professional**", we mean eMoney's commercial customer such as licensed financial advisors, financial institutions, broker-dealers, home offices, registered investment advisors, third party administrators, trust companies, and family office clients.

When we use the term "**process**", we mean access, use, store, convert, format, compile, display and/or distribute. When we refer to "user(s)" or "you" in this Notice, we are referring to individual consumers who receive access credentials to Incentive through participation in a 401(k) plan or from a financial professional.

Our Collection of Personal Information

The types of personal information we collect about you depends on how you interact with us and our Services. We may collect personal information directly from you and automatically when you interact with our Sites or Services. We may also collect personal information about you from other sources and third parties, even before our first direct interaction. The following are the categories and specific types of personal information that we collect:

Personal Information You Provide to Us Directly:

- Contact Information: such as your name, address, phone number, and email address.
- Demographic Information: such as your date of birth.
- Account Information: such as your account username and password, and security questions as well as any information you place in the Vault.
- Transaction Information: such as payment information and purchase details.
- Event Information: such as your webinar, eMoney Summit, or other event enrollment information.
- Survey Information: such as your responses to User experience inquiries.
- Inquiry Information: such as the content of your email, text, or chat with us and, where applicable, your voice from calls with us.

- Prospective Employment Information: such as your resume, work history and references. For more information please visit here.

Personal Information Automatically Collected through our Sites or Services:

- Device Information: including your IP address, browser type, internet service provider, pages visited, operating system, user log and clickstream data, and time and date of visit.
- Cookie and Related Technology Data: including your usage and activity on our Sites and other interactions with our services using essential and non-essential cookies, web beacons and related data collection technologies.
- Location Data: including your general geographic location based on your IP address or more precise location when accessing our services through a mobile device.

For more information about cookies and related technologies, including on how to control your privacy settings, please read our Cookie Policy.

Personal Information Collected from Other Sources

We sometimes also collect Account Information and Transaction Information from other sources which we may combine with personal information we collect from you. We receive such information from the following sources and third parties:

- Business Partners: Our business partners, such as our corporate affiliates, when your third-party service provider, collect personal information and often share some or all of this information with us. For example, in some instances we receive data feeds based on potential or integrated service offerings at the direction of the User. We also collect personal information from business partners involved in the administration of 401(k) plans, such as plan sponsors (employers), financial professionals, plan administrators, custodians, and recordkeepers. We may collect personal information from these parties in order to help financial professionals provide our Services to you. For example, once you elect to participate in your employer's 401(k) plan, your employer will share your name, email, date of birth, and salary with your plan's financial professional so he or she can input that information into our services and start creating your user account with us. We will then generate a unique invitation code for you so you can complete your onboarding process with us. Your plan sponsor (employer) also may provide us, through your financial professional, your 401(k) balance and deferral rate so your financial professional can use our services to recommend savings challenges to you.
- Service Providers/Contractors: Our service providers and contractors, such as payment processors and analytics providers, collect personal information through the Sites and Services, and often share some or all of this information with us. For example, we receive usage analysis data to improve and expand our services.
- Advisors: Advisors collect personal information directly from Customers and input that information into our Services. The information typically concerns Customers, their finances and their family, including name, address, phone number and financial information.
- Financial Institutions: at the direction of a Customer, financial institutions will share certain financial account information of that Customer with us. For example, when a Customer opts-in to link his or her investment account to our Services, that financial institution will share the account information with us so we can provide the Customer with an aggregated view of their financial information (this is called our "**Connections**" feature).
- Publicly Available Sources: you have registered for our Services, from time to time we may obtain additional personal information about you, such as address change information, from publicly available sources to keep our records current.
- We Collect Personal Information from Other Users: We may collect personal information about you from other Mobile App users. For example, a spouse may link a joint bank account to our Mobile App, which would share with us financial information about the other spouse. In addition, for individuals that share an Incentive account with you (e.g. a family account), we may collect information about you from those individuals.

- Social Media: If you choose to interact with us on social media, we may collect personal information about you from your social media account that you make public or share with us. We use personal information collected in connection with your social media account to communicate with you and better understand how you use our services.

Our Use of Personal Information

We use your personal information for the following commercial purposes and business purposes:

1. Auditing: Auditing related to a current interaction with the Customer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
2. Security: Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
3. Debugging: Debugging to identify and repair errors that impair existing intended functionality.
4. Short-term, transient use: provided that the personal information is not disclosed to another third party and is not used to build a profile about a Customer or otherwise alter an individual Customer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
5. Providing Services: Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
6. Research: Undertaking internal research for technological development and demonstration.
7. Quality and Safety: Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.

Specifically, we may use personal information we collect:

To Provide Products and Services

- Enable your activity within our Services and provide the Sites and Services to you generally, including to develop, enhance, and improve our Sites and Services and your experience.
- Register you for our Services and create your account with us.
- Enable you to use our Services, including to complete the onboarding process, receive coaching or training from us, or create financial plans.
- Deliver services you request, such as adding features or new functionality to the Sites and Services and providing customer service and technical support.
- Register you for webinars, events, and conferences.
- To enable single sign on (SSO) functionality and allow you to securely log in to several Services at once.

To Communicate With You

- Communicate with you and tell you about our current and future services, and offer you third party products and services we think you may find useful.
- Obtain your feedback in order to improve your experience with our Sites and Services, including through surveys we may send you on occasion (surveys are 100% optional and declining to complete a survey will not negatively impact your use of our Sites and Services).
- Communicate with you about and facilitate new contests, promotions and rewards, and upcoming events.
- Provide you with news about products and services offered by us and our business partners.

For Analytics and Personalization

- Provide you with a customized user experience**.**
- Display advertising that is tailored to your interests, including the marketing of our services (for more information on interest-based advertising, please see our Cookie Policy – you also may opt out of receiving marketing communications from us at any time by following the instructions in the communication or emailing us as instructed below in the section titled, "Communications Preferences")**.**
- Link or combine with other information we get from third parties, to help understand your needs, customize our offerings to those needs, and provide you with better services.

For Security and Fraud and Prevention

- We use personal information to detect, investigate, prevent, or take action regarding possible malicious, deceptive, fraudulent, or illegal activity, including fraudulent transactions, attempts to manipulate or violate our policies, procedures, and terms and conditions, security incidents, and harm to the rights, property, or safety of eMoney and our users, customers, employees, or others.
- Enable SSO functionality and allow you to securely log in to several Services at once.
- Enhance the security of our Sites and Services and strengthen our defenses against cyber attacks and other unauthorized uses and disclosures

To Fulfill Our Legal Obligations

- We use personal information to comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.

To Perform Core Business Functions

- Provide and maintain functionality of our Sites and Services.
- Review the usage of, improve the quality of and expand our services.
- Enforce and carry out contracts and agreements.
- Conduct internal operations pertaining to research, analytics, innovation, testing, monitoring, client communication, risk management, and administration.
- Perform routine backups of our data systems and prepare for disaster recovery.
- Coordinate with our business partners to allow them to market their products and services to you.
- Process and deliver contest entries and rewards.
- Conduct research and surveys used to measure our performance and improve our and our business partners' products, services and User experience.

To Manage Job Applications

- Evaluate a job applicant for a position at eMoney in accordance with our human resources policy (prospective employee information is used solely for this purpose).

Our Disclosure of Personal Information

We disclose personal information in the following ways:

- Within eMoney: eMoney discloses personal information within eMoney and with our corporate affiliates for purposes and uses consistent with this Policy. For example, we may disclose your contact information to facilitate communication between you and an eMoney customer service representative. We share your personal information with various third parties so they can administer your 401(k) plan effectively, and so we can improve our services. For example, our Mobile App facilitates the relationship between you and the financial professional administering your 401(k) plan. As a result, the financial professional has access to most information you input into our services. Your financial professional will not see your transaction-level data, however, unless you affirmatively opt in to that level of access. Our Services also permit your financial professional to share statistical and anonymized data with your employer or other parties involved in administering your 401(k) plan. For more information, please see our Anonymized Data section below.

- Third Party Business Partners: We may disclose personal information about Users with third parties, such as such as business partners, for research, academic, marketing and/or promotional purposes. We aim to conduct such research in a way that does not allow you or any other person to be identified. For example, we may share anonymized data regarding assets under management for our Advisors or demographic data that describes the average time spent using the services. We or our third-party partners may publicly report the statistical trends of the research or analysis, but only in a way that would not allow you or any other person to be identified.
- Service Providers/Contractors: We engage third-party service providers and contractors to perform functions and services on our behalf and under our instruction to make our Sites and Services available to you. For example, we may disclose transaction information to our payment processors to facilitate your transaction. We also may disclose additional personal information to application functionality providers to enable them to provide the necessary hardware, software, networking, storage, and other services we use to operate our services and maintain a high-quality experience for you. We may share your information with service providers that enable us to provide our Sites and Services and help us operate our business, such as website design, sending email communications, fraud detection and prevention, customer care, or performing analytics.
- Corporate Business Transactions: We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We disclose personal information to a third-party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal information may also be disclosed in the event of insolvency, bankruptcy, or receivership.
- Legal Obligations and Rights: We may disclose personal information:
    - in connection with the establishment, exercise, or defense of legal claims;
    - to comply with laws or to respond to lawful requests and legal process;
    - to protect the rights and property of us, our agents, customers, and others, including to enforce our agreements, policies, and terms of use;
    - to fulfill our contractual obligations;
    - to detect, suppress, or prevent illegal activities, fraud, or misuse of data;
    - to protect the health and safety of us, our customers, or any person; or
    - as otherwise required by applicable law.
- Consent: With your consent, or as directed by you or your authorized representative, we may disclose personal information about you to other third parties not described in this Policy.
    - For example, the eMoney Wealth Management System exists to facilitate the relationship between you and your Advisor. As a result, the Advisor has access to your account information and anything that you elect to share with your Advisor.
    - We also may share personal information with websites or services that you (or your Advisor on your behalf) have granted permission to access your eMoney account, such as financial institutions for purposes of facilitating our products and services.
    - We also facilitate your sharing of information with your Alliance Partners where you have granted them access to your account.

Anonymized and De-Identified Data

We may collect encoded or anonymized information or statistical data (such as IP addresses) ("**Usage Data**") about a group or category of services, features or Users for research purposes. Usage Data helps us understand trends in usage of our services so that we can better consider new features or otherwise tailor our services. In addition to collecting and using Usage Data ourselves, we may share Usage Data with third parties, including our Advisor clients, affiliates, partners, and service providers, for various purposes, including to help us better understand our customers' needs and improve our services as well as for advertising and marketing purposes.

We may, from time to time, collect de-identified data ("**De-identified Data**") from our Users to prepare analyses, reports, and other materials regarding (i) how Users use the Services, (ii) the types and volume of assets managed within the Services, and (iii) other matters which may be useful to the financial advisor community. This De-identified Data may be combined with other Users' De-identified Data for such purposes.

Controlling Your Personal Information

We process and store information on behalf of Users. At all times, Customers may choose whether or not to provide or disclose personal information to us. If you choose not to provide mandatory personal information, you may still visit parts of our Sites and/or our Services, but you may be unable to access certain options, programs, and services we typically offer. If you choose to share personal information with us, we strive to maintain accurate records of your personal information. To correct or delete personal information we store, Advisors may contact eMoney Customer Service by email, customerservice@emoneyadvisor.com, or by phone, 1-888-362-8482. For California Privacy Disclosure requests, please see visit the eMoney Advisor, LLC Privacy Policy Additional California Privacy Disclosures below.

Customers may correct or delete account aggregation information, by logging into the Services using their log-in credentials and make whatever changes and deletions they desire to the accounts they have established. All other information stored within the Services can only be changed or removed through the Customer's Advisor. Customers should contact their Advisor if they want to change or remove information concerning them that is stored in the Services.

Communication Preferences

If you have opted-in to our marketing communications (or, where permitted by law, if you have provided us or we have obtained your contact information), we may send you email messages, direct mail offers, push notifications or other communications regarding products or services depending on the method of communication selected. If you would like to opt out of receiving communications from eMoney, please contact us at unsubscribe@emoneyadvisor.com or follow the unsubscribe instructions included in each marketing email. Please note that even if you opt out of receiving the foregoing communications, we may still contact you in response to any "Contact Us" requests as well as for administrative purposes.

Region-Specific Disclosures

We may choose or be required by law to provide different or additional disclosures relating to the processing of personal information about residents of certain countries and regions. Please click below to review additional disclosures applicable to you: If you are a resident of the State of California in the United States, click here for additional California privacy disclosures.

To Exercise Your Rights as a California Resident, please submit a request by:

- Calling 1-888-362-8482, select Option 1 for Customer Support and then select Option 9 to speak with a client services representative trained to address your request.
- Email us at privacy-cs@emoneyadvisor.com.

Children's Privacy

Our Sites and Services are not directed to children under the age of 13. We do not intend to, or knowingly, collect or solicit personal information directly from children under the age of 13. If you are under the age of 13, do not use our Sites or Services or provide us with any personal information either directly or by other means. If a child under 13 has provided personal information to us, we encourage the child's parent or guardian to contact us to request that we remove the personal information from our systems. If we learn that any personal information we collect has been provided by a child under the age of 13, we will promptly delete that personal information. A child's parent or guardian may provide the child's information to us as part of a household.

Third-Party Websites

Our Sites and Services may contain links to third party websites and include embedded content that are hosted by such third parties. We are not responsible for the privacy practices or the content of these other websites. These third parties may use web measurement and customization technologies (such as cookies) in conjunction with the provision of this content or functionality. If you use a link to another website or view an embedded video, you should consult the privacy Policy for that site. We have no control over the information that is submitted to, or collected by, other websites and we are not responsible for the content of any linked site, or any link contained in a linked site, or any changes or updates to such sites, or any embedded video. This Policy applies solely to information collected by us or otherwise stored in the Services and our Site.

Changes to This Policy

We will update this Policy from time to time. When we make changes to this Policy, we will change the date at the beginning of this Policy to include the "Last Updated" date. If we make material changes to this Policy, we will notify you by email to your registered email address, by prominent posting on our Sites and Services (such as by placing a conspicuous announcement of the new Policy on the Sites or by presenting you with a web page containing an electronic copy of the Policy), or through other communication channels. All changes shall be effective from the date of publication unless otherwise provided in the notification. Your only remedy, if you do not accept the terms of this Policy, is to discontinue use of our Sites or Services.

How to Contact Us

If you have any questions regarding this Policy, our Sites, the Services, or about eMoney's privacy practices, please contact us by email at privacy@emoneyadvisor.com using the subject title of "Privacy Policy", by phone at 1-888-362-8482 (and mention that you have a Privacy Policy issue related to the Services) or by mail to:

eMoney Advisor, LLC
Attn: Privacy Officer
Four Radnor Corporate Center, Suite 300
100 Matsonford Road
Radnor, PA 19087

eMONEY ADVISOR, LLC PRIVACY POLICY ADDITIONAL CALIFORNIA PRIVACY DISCLOSURES

Last Updated: October 2022

Personal Information Disclosures
Your Privacy Rights
Changes to These Disclosures

These Additional California Privacy Disclosures ("**CA Disclosures**") supplement the information contained in the eMoney Privacy Policy. These Disclosures apply solely to our processing of personal information of individual California residents within the scope of the California Consumer Privacy Act of 2018 ("**CCPA**"). Any terms defined within the CCPA have the same meaning when utilizing within this CA Disclosures. The other provisions of the Policy continue to apply except as modified in this CA Disclosures.

This CA Policy does not apply to personal information if it is:

- Personal information covered by certain privacy laws, including the Fair Credit Reporting Act ("**FRCA**"), the Gramm-Leach-Bliley Act ("**GLBA**"), the California Financial Information Privacy Act ("**FIPA**"), or the Driver's Privacy Protection Act of 1994.
- Publicly available information from government records.
- De-identified or Aggregated Consumer Information.

eMoney and the CCPA

The majority of personal information that eMoney collects or maintains as a service provider to financial institutions is covered by one or more of the exemptions described below (see "**CCPA Exemptions**" below). As a result, in most cases, eMoney may deny CCPA requests because of the personal information at issue is subject to an exemption. For example, your CCPA request may be denied if:

- If your relationship and interactions with eMoney consist solely of personal financial services (e.g., your advisor provides you financial planning through a comprehensive look at your aggregated accounts with financial institutions), the personal information collected and processed about you is subject to the GLBA and therefore your CCPA request will not be honored.
- If you participate in a workplace retirement plan, or other employee benefit plan sponsored by or provided through your employer, and that is serviced or administered by a company using eMoney's services, your CCPA request should be directed to your employer.
- If you have an institutional relationship (e.g., registered investment advisor, broker-dealer, bank, or trust), the information collected about you in the context of that business relationship is not covered by the CCPA and therefore your CCPA request will not be honored by the Fidelity company.
- If your interaction with a Fidelity company is solely as a business customer of a Fidelity company, personal information collected is not covered by the CCPA and therefore the Fidelity company will not honor any CCPA requests submitted.

Collection, Disclosure and Sale of Personal Information

You can find a list of the categories of personal information that we collect in the "Our Collection of Personal Information" section above. For details regarding the sources form which we obtain personal information, please see the "How We Collect Your Personal Information" section above. We collect and use personal information for the business or commercial purposes described in the "Our Use of Your Personal Information" section above.

In the last 12 months, we have collected and disclosed the following categories of personal information for a business purpose:

Category of Personal Information	**Collected**	**Disclosed for Business Purpose**	**Sold***
Basic Identifiers: Name, postal address, phone number, and email address, and similar identifiers	✓	✓	No Personal Information Sold

Personal Information Categories in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)): including your contact information, identifiers, such as name, email address, mailing address, phone number, account id, and security/authentication information, financial account information, joint account holder and family information, credit and identity information relating to your account, account history relating to your account, and any other information you provide to us, including tax records, income level and signature	✓	✓	
Protected Classification Characteristics: including age, date of birth, gender, and sex.	✓	✓	
Commercial Information: including account history, investment history, purchases, transaction information, insurance coverage information, service profile information, interests, and feedback information, order details, order/product preferences, and credit information	✓	✓	
Biometric Information	Not collected	Not collected	
Device Information and Other Unique Identifiers: including log file data (e.g., IP address, browser type, clickstream data) and cookies and related technology data (e.g., your usage and activity on our Sites or Services)	✓	✓	
Geolocation Data, such as your general geographic location based on your IP address or more precise location when accessing our Sites or Services through a mobile device	✓	✓	
Sensory Information, such as voice recordings from calls to customer service	✓	✓	
Profession/Employment Information, such as the business you represent your employer, department, income if provided, work history, and work title	✓	✓	
Non-Public Education Information (20 U.S.C. § 1232g, 34 C.F.R. Part 99) such as education history and any other educational information provided to us.	✓	✓	

Although eMoney does not “sell” information for monetary compensation, our use of tracking technologies and allowing third-party advertising and analytics providers to collect certain personal information directly from individuals who visit or interact with our Sites and Services may be considered a “sale” under California law.

You can opt-out of being tracked by these third parties by clicking “Do Not Sell My Personal Information” link at the bottom of our website and selecting your preferences, or by broadcasting the global privacy control (“**GPC**”) signal. Please note GPC signals are browser dependent and some browsers may not accept GPC signals unless a browser extension is used; please refer to your browser requirements to ensure you are transmitting the GPC signal accurately. Please note that your use of our website may still be tracked by eMoney and/or our service providers when necessary, such as to provide the website or security purposes. We do not knowingly sell the personal information of consumers under 16 years of age.

Categories of personal information disclosed that may be considered a “sale” under California law: Basic Identifying Information, Device Information and Other Unique Identifiers, Internet or Other Network Activity, Geolocation Data, and Commercial Information.

Categories of third parties to whom personal information was disclosed that may be considered a “sale” under California law: advertisers and marketing partners, data analytics providers, and social media networks.

Sources of Personal Information

As described in the Our Collection of Personal Information section of our Privacy Policy, we collect personal information directly from you when you provide it to us, automatically when you visit our Sites and use our Services, from publicly available sources, and from service providers and other listed third parties, including business partners, advisors, and financial institutions.

Purposes for Collecting Personal Information

We collect personal information about you for the purposes described in the Our Use of Personal Information section of our Privacy Policy. For representatives of our clients, vendors, service providers and other third parties, we also collect your personal information to maintain an ongoing relationship between us and the entity you represent and to contact you in connection with our relationship with the entity you represent.

Recipients of Personal Information

As described in the Our Use of Personal Information section under the subtitle “Disclosures of Personal Information” of our Privacy Policy, we share personal information with a variety of third parties. For representatives of our clients, vendors, service providers and other third parties, we also share your personal information with the entity you represent.

Your Privacy Rights

Subject to certain limitations, California residents have the right to request access to (also referred to as the “right to know”) the categories and specific pieces of personal information we collect, use, and disclose; the right to request deletion of their personal information; the right to opt out of any sales of personal information that may be occurring; and the right to non-discrimination.

Knowledge	You have the right to request the following personal information we have collected and disclosed about you in the last 12 months: ● A copy of the personal information we have collected about you; ● The categories and specific pieces of personal information we have collected about you; ● The categories of sources of the personal information we have collected about you; ● The categories of personal information we have disclosed about you to third parties for a business purpose, and the categories of recipients to whom this information was disclosed; ● The categories of personal information we have sold about you (if any), and the categories of third parties to whom this information was sold; and ● The business or commercial purposes for collecting or, if applicable, selling personal information.
Deletion	You have the right to request the deletion or erasure of personal information we have collected about you.
Opt-out	You have the right to opt-tout of the “sale” of your personal information we have collected about you to third parties.
Non-Discrimination	The right to be free from discrimination for exercising any of the rights described above. The right to non-discrimination does not prohibit us from offering you certain financial incentives that may result in different prices, rates or quality levels of products or services. In addition, please note that if the exercise of the rights described above limits our ability to process personal information (such as in the case of a deletion request), we may not be able to provide access to certain of our products and services to individuals who exercise these rights, or to otherwise engage with such individuals going forward.

How to Submit a Request

To Exercise Your Rights as a California Resident, please submit a request by:

- Calling 1-888-362-8482, select Option 1 for Customer Support and then select Option 9 to speak with a client services representative trained to address your request.
- Email us at privacy@emoneyadvisor.com.

We will need to verify your identity before processing your request. To verify your identity, we will generally either require the successful login to your account or the matching of sufficient information you provide us to the information we maintain about you in our systems. Although we try to limit the personal information collected in connection with a request to exercise the right to know and/or the right to deletion, certain requests may require us to obtain additional personal information from you. In certain circumstances, we may decline a request to exercise the right to know and/or right to deletion, particularly where we are unable to verify your identity.

California "Shine the Light" Law

California residents that have an established business relationship with us have rights to know how their information is disclosed to third parties for their direct marketing purposes under California's "Shine the Light" law (Civ. Code § 1798.83). We may disclose Personal Information to affiliates, which may use this information for all purposes outlined in our Privacy Policy. Because separate legal entities are considered "third parties" for purposes of California Civil Code Section 1798.83, and certain communications from our affiliates might be viewed as promoting their financial services, we are providing the following information for California residents who have provided us with their personal information during the creation of or during the course of an established services relationship that is primarily for personal, family, or household purposes ("**Individual California Users**"). Individual California Users must submit their requests to us either by email at privacy@emoneyadvisor.com or by mail at the address listed in the How to Contact Us section of the Privacy Policy and specify that you want a copy of your "Shine the Light" California Privacy Rights Policy.

We will provide a list of the categories of Personal Information disclosed to third parties (i.e., our affiliates) for their direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than to the email or mailing addresses specified in this section.

Changes to These Disclosures

We will update these Disclosures from time to time. When we make changes to these Disclosures, we will change the date at the beginning of these Disclosures to include the "Last Updated" date. If we make material changes to these Disclosures, we will notify you by email to your registered email address, by prominent posting on our Sites or Services (such as by placing a conspicuous announcement of the new Disclosures on the Sites or by presenting you with a web page containing an electronic copy of the new Disclosures), or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided in the notification. Your only remedy, if you do not accept the terms of these Disclosures, is to discontinue use of our Sites and Services.