

Financial Guard

Privacy and Information Security Notice

October 2018

Your Privacy and the Security of Your Personal Information is Very Important to Financial Guard

This Privacy and Information Security Notice (the “Privacy Notice”) addresses Financial Guard’s, (“we” or “us”), privacy and data protection practices with respect to clients’ nonpublic personal information that it may receive in the ordinary course of its business. The provisions of this Privacy Notice apply to your information both while you are a client of Financial Guard as well as thereafter.

How Does Financial Guard Collect Your Personal Information

By you accessing and utilizing our investment advisory and other services that we offer through our website at www.FinancialGuard.com (the “Website”), we may collect certain personal information about you. The personal information that we may collect comes from the following sources:

- From you, such as the information that you provide on account applications or other forms that you complete and submit on or through the Website;
- As a result of your transactions with us, our affiliates and nonaffiliated third parties; and
- From other sources, such as the accounts maintained at other financial institutions (“Outside Accounts”) that you choose to link to through your Financial Guard account in connection with our Aggregation Service.

We also use browser and session “cookies” to customize and improve your experience on the Website. A cookie is a text file containing small amounts of information which are downloaded to the user’s device when a user visits a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies perform lots of different functions, like allowing the navigation between pages efficiently, remembering the user’s preferences, and generally improving the user’s experience. Cookies can be either persistent cookies, session, or third-party cookies. Persistent cookies stay in one of the browser’s subfolders until they are deleted manually or until the browser deletes them based on the duration period contained within the persistent cookie’s file. Session cookies are temporary cookie files, which are erased when the browser is turned off, so any log-in details or preferences are not stored or remembered after the exit from the website visited. Third party cookies are cookies set by a separate entity to the website owner through the website of the website owner. Cookies are required for the Website functionality. If you refuse to accept cookies or disable them, you will not be able to sign into your Financial Guard account on the Website.

The Type of Nonpublic Personal Information Financial Guard Collects

The type of nonpublic personal information that Financial Guard collects and maintains about you and with respect to your account at Financial Guard may include, but is not limited to your: name, social security number, address, e-mail address, date of birth, income level, investible assets, net worth, employment information, citizenship, account balances, transaction history,

holdings and any other type of personal information that we may need in order to comply with applicable laws and regulations. In addition, in connection with the establishment of your Website account, we collect and store your user ID, password, and security challenge questions and responses thereto.

Please note that we may also collect and maintain certain nonpublic personal information (such as account holdings and balances) about other persons to the extent you share the other persons' information in connection with your use of our Aggregation Service. By signing up for our Aggregation Service, you warrant and represent to us that you have the legal right to disclose or allow access to such other persons' information that may be available in the Outside Accounts. Our privacy and information security practices described herein will extend to any such information of other persons that we may receive in connection with your use of the Aggregation Service.

How Financial Guard Uses Nonpublic Personal Information About You

Financial Guard does not sell or share your nonpublic personal information with its affiliates or any third parties for any type of marketing purpose, unless it has obtained your permission to do so, including as described below. Financial Guard does not disclose any nonpublic personal information about you except as may be required to perform transactions or services you have requested or authorized or as permitted or required by law. Financial Guard may disclose information about you to:

- Employees, agents, and affiliates on a "need to know" basis to enable Financial Guard to conduct ordinary business or comply with obligations to government regulators;
- Service providers, including Financial Guard affiliates, that perform various services on our behalf in order to assist us in conducting our ordinary course of business, including companies that may perform marketing services solely for Financial Guard; and
- Financial Guard advisers, such as legal counsel, accountants and auditors, who are required to maintain confidentiality of any information that we share with them in their capacity as our fiduciaries.

Except as otherwise permitted by applicable law, companies acting on Financial Guard's behalf are contractually obligated to (i) keep nonpublic personal information Financial Guard provides to them confidential and to follow appropriate standards of security and confidentiality in doing so, and (ii) use the information Financial Guard shares only for the services for which Financial Guard hired them and not to use or share such information for any other purpose.

Financial Guard may also disclose nonpublic personal information when necessary to enforce its rights or protect against fraud, or as permitted or required by applicable law, such as in connection with a law enforcement or regulatory request, subpoena, or similar legal process.

Keeping You Informed of Financial Guard's Privacy and Information Security Practices

While Financial Guard reserves the right to modify or change this Privacy Notice at any time, we will notify you promptly of any such changes or modifications.

Financial Guard maintains client nonpublic personal information as described in this notice for a period of 6 years after you are no longer a client.

Financial Guard's Security Practices

Financial Guard maintains appropriate physical, electronic and procedural safeguards designed to guard nonpublic personal information. Financial Guard's internal data security policies restrict access to clients' nonpublic personal information to authorized employees on a "need-to-know" basis who may use such nonpublic personal information for Financial Guard business purposes only.

Although Financial Guard strives to protect your nonpublic personal information, we do not warrant the security of any information you provide or transmit to us, and you do so at your own risk. In the event of a breach of the confidentiality or security of your nonpublic personal information, Financial Guard will attempt to notify you as necessary so that you can take appropriate protective steps. Clients, having consented to using electronic means for communications, will be notified using the most current email address you have provided to us with respect to your Financial Guard account.

In order for Financial Guard to provide effective service to you, keeping your account information accurate and up to date is very important. If you believe that your account information is incomplete, not accurate or not current, or if you have questions about Financial Guard's privacy and information security practices, you may contact Financial Guard in any of the following ways:

By Email: support@financialguard.com

By Phone: (877) 247-6070

By Mail:

Financial Guard
1952 E. Fort Union Blvd.
Suite 200
Salt Lake City, Utah 84121