

## **Fiducient Advisors LLC California, U.S. and GDPR Privacy Policy**

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## **Our Commitment to Protect your Privacy**

Fiducient Advisors LLC (“Fiducient,” “us”, “our” or “we”) values the trust our clients place in us and we commit to responsible management, use and protection of our clients’ (“you” or “your”) personal information. Applicable federal and international laws (for example, the General Data Protection Regulation (“GDPR”) and the California Consumer Privacy Act (“CCPA”)) require we inform you how we collect, share, use, and protect your personal information (including on our Website) as well as your privacy rights prescribed by applicable law.

In addition to Fiducient’s interactions offline, clients may also have access to our services through Fiducient’s Website (“Website”). To deliver these services as effectively and conveniently as possible, it is essential that we manage and maintain certain client information.

If you are a California resident or otherwise covered under CCPA, personal information and nonpublic information also includes personal information as defined under CCPA but does not include personal information that is exempted from the CCPA, such as personal information covered by other privacy law, such as the Gramm-Leach Bliley Act.

If you are a resident of the European Union or otherwise covered under GDPR, personal information and nonpublic information also includes personal data as defined under GDPR. Please take a moment to review our “Privacy Policy.”

*When you visit our Website, you are accepting the practices described in this Privacy Policy. If you do not agree, please do not use our Website.*

## **Changes to this Privacy Policy**

This Privacy Policy may change from time to time and should be reviewed periodically. Fiducient provides annual notice to each of its clients concerning its sharing practices. If, at any time, Fiducient adopts material changes to its privacy policies, the firm shall provide each client with a revised notice reflecting the new privacy policies. Any changes shall be effective immediately upon issuance of the updated Privacy Policy and/or posting on our Website.

A copy of our most current version of this Privacy Policy is available upon request or can be accessed from the link on the bottom of our homepage, or at the bottom of our other Website pages. By accessing our Website after we have posted changes to this Privacy Policy, you are agreeing to the terms of the Privacy Policy as modified.

## **Why We Collect Information**

Fiducient gathers information to help us serve your financial needs, provide customer service, and fulfill legal and regulatory requirements. Any collection of personal information is used to support our normal business operations and to service and develop our relationship with you. In addition to the information collected, during the course of our relationship, we may also collect a variety of nonpublic personal information from other sources.

## **Information We Collect From You**

The type of nonpublic personal information we collect and share depends on the offering or service we provide you. This information can include, but is not limited to, your:

- Personal information and identifiers – Information contained in applications and other forms such as; name, address, telephone number, email address, family member information, occupation, education level,

beneficiaries, driver's license, passport, tax identification number, account numbers, assets, and income;

- Protected classification characteristics – We do not collect client information regarding characteristics of protected classifications such as; race, nation origin, ethnicity, gender, religious beliefs, sex, disability;
- Commercial information – Records of products or services purchased, obtained or considered, account balances and transactions and payment history;
- Biometric information – We do not collect client information regarding fingerprints or any other genetic or biological characteristics or activity patterns used for identify personal information
- Internet or other electronic network activity information – Email address, IP address, and information from visits to our website such as; site visitorship data and cookies
- Geolocation data – IP address
- Sensory data – We do not collect client information regarding sensory, other than voicemails recorded by prospects and clients to respond to request and facilitate relationships;
- Professional or employment related information – RFPs, due diligence questionnaires, vendor and third-party service provider agreements;
- Education information that is not public – We do not collect client information regarding non-public education records;
- Information required for us to meet legal and regulatory requirements, including anti-money laundering regulations;
- Any other information you may provide to us – Client information voluntarily provided in order better to effect transactions and maintain your account.

Our products and services are not intended for children and we will not knowingly collect any data related to children unless they are a beneficiary in which case we will only collect and use the information as required to perform our obligations to the associated client.

### **How We Collect Information**

Commonly, we will collect client information directly from you when you contact us or provide information in order for us to provide our products and services as well as effect transactions and maintain your account. This personal information may include, but are not limited to:

- Information on applications and related forms, such as name, address, Social Security Number, assets and income
- Information regarding your transactions, such as purchases, sales and account balances
- Information from your employer, association, or benefit plan sponsor, such as name, address, Social Security Number, assets, and income

Any information we collect when guests visit our Website does not identify individual users, however we do collect the amount of traffic visiting the Website, which pages are visited and for how long, where visitors come from, and what ISP they are using. We use the information we collect to improve the quality of our Website, enhance or tailor the information we offer, and make your experience on our Website as valuable and efficient as possible.

For more information please see the section below titled, "Do We Use "Cookies" or Obtain Personal Information by Automated Means?"

### **How We Use Your Information**

We collect and use your personal information for the purpose of providing our investment consulting and investment management services, as well as other related services, including handling transactions or providing services requested by you or persons authorized by you. In managing your investment for you, we will use your personal information to:

- Monitor, audit, evaluate and otherwise administer our services;
- Provide continuous service to you and to conduct business processing functions including by providing personal information to our contractors, certain Affiliates, service providers, or other third parties;
- Communicate with you and respond to your inquiries;
- In an effort to prevent and protect against fraud and identify theft;
- In an effort to prevent copyright infringement, unauthorized use and distribution of protected content and other unlawful activity, claims and liabilities;
- Pursuit of our legitimate interests;
- Conduct investigations and comply with and enforce applicable legal obligations, relevant industry standards, contractual obligations and our policies and terms; and/or
- For other purposes required or authorized by law, including other purposes for which you have provided your consent.

In the event that we use your personal information purposes not identified above where your direct is required under applicable rules, laws and/or regulations we will provide specific notice at the time we collect such personal information.

### **Information We May Disclose to Third Parties**

Fiducient does not and will not sell your personal information to anyone. We do not disclose nonpublic personal information about you to anyone, except as permitted or required by law.

In the course of servicing your account, Fiducient may share information collected about you for business purposes with Affiliated and authorized Nonaffiliated parties. Affiliated and Nonaffiliated parties are not authorized to use or disclose your personal information except as necessary to perform services on our behalf or comply with legal requirements. Third parties may include; mutual fund companies, broker/dealers, insurance companies, banks and investment firms and autonomous marketing distribution vendors. We share personal information with business partners and Affiliates who manage and

assist with our administrative, technology and business operations including CRM and billing software management, as well as email storage and archiving. We also disclose personal information about you to an Affiliated SEC registered Investment Adviser, in order to help perform and market services on our behalf to service you and, alongside Fiducient, market our products to you. We may also disclose your information to other organizations such as government agencies and law enforcement officials (for example, for tax reporting or under court order), or to other organizations and individuals with your consent (for example, to your attorney or tax professional).

Finally, Fiducient may share information with other third-party organizations Fiducient engages to service and maintain your account (for example, software companies used for client reporting) or to meet firm regulatory obligations. Fiducient does not disclose your nonpublic personal information, except as provided above.

Disclosure of any personal information about our former clients and business contacts is handled in the same manner as for our current clients and business contacts.

In the section below pursuant to U.S. Federal Laws, we list the reasons financial companies can share their customers' personal information; the reasons Fiducient chooses to share; and whether you can limit this sharing.

<b>Reasons we can share your Personal Information</b>	<b>Does Fiducient share?</b>	<b>Can you limit sharing?</b>
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations	Yes	No
<b>For our marketing purposes</b> - to offer our services to you	Yes	Yes
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our Affiliates' everyday business purposes</b> - information about your transactions and experiences	Yes	No
<b>For our Affiliates' everyday business purposes</b> - information about your creditworthiness	No	We don't share
<b>For our Affiliates to market to you</b>	No	We don't share
<b>For Nonaffiliates to market to you</b>	No	We don't share

### **Limits on Sharing**

To the extent U.S. Federal laws apply to your personal information, you have the right to limit only:

- sharing for Affiliates' everyday business purposes - information about your creditworthiness;
- Affiliates from using your information to market to you; and
- sharing for Nonaffiliates to market to you.

U.S. state laws and individual companies may give you additional rights to limit sharing. Residents of California have additional rights described below.

### **Lawful Basis for Processing**

Fiducient may have one or more of the following lawful bases to process your personal information:

- Consent: you're freely, informed, and voluntary consent to process your personal information in connection to our investment services.
- Contract: processing your personal information is necessary in order to fulfill a contract.
- Legal Obligation: processing is necessary to comply with applicable rules, laws, and regulations.
- Legitimate Interests: processing is necessary to the legitimate interests of our firm and/or a third party.

### **Individual Rights**

To the extent permitted by the applicable law of your jurisdiction, in relation to your personal information, you may request:

- to have your personal information corrected, for example, if it is incomplete or incorrect;
- to opt out of receiving marketing communications at any time;
- the right to file a complaint with an applicable government regulator such as a Data Protection Authority.

In addition to the foregoing, if you are located in the European Economic Area ("EEA"), to the extent permitted by applicable law, in relation to your personal information, you may request:

- to access the personal information held by us about you;
- the right to restrict or object to the processing of your personal information, or request that your personal information is erased;
- the right to receive a copy of the personal information which you have provided to our firm, in a structured, commonly used and machine-readable format (known as "data portability");
- have a copy of the personal information we hold about you provided to you or another controller where technically feasible;
- where you have provided personal information voluntarily, or otherwise consented to its use, the right to withdraw your consent.

To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to your information.

To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain.

### **California Residents**

The CCPA provides residents of California with certain rights with respect to the personal information held by a

business. These rights may include:

- **Right to Access** – You have the right to request that we disclose the categories of personal information that we have collected about you and the specific pieces of that personal information we have collected in the past 12 months, the categories of sources from which personal information is collected, the categories of third parties with which we share personal information, and the business purpose or commercial purpose for collection.
- **Right to Request Deletion** – You have the right to request that we delete certain personal information about you that we collect or a service provider collects on our behalf. However, certain requests to delete personal information may be denied if we are required to retain the information to comply with legal obligations, the information is necessary for detecting or preventing security incidents, exercising free speech, protecting or defending against legal claims, or for internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- **Right to Non-Discrimination** – You have the right not to receive discriminatory treatment by us for exercising these privacy rights. We do not offer financial incentives directly related to the provision of personal information.
- **Authorized Agent** – You have the right to designate an authorized agent to make these requests on your behalf.

These rights do not cover personal information that is restricted or prohibited by law, rule or regulation, or is otherwise exempted from the CCPA, such as personal information covered by other privacy laws; including the Gramm-Leach Bliley Act. If the CCPA applies to you and wish to exercise any of these rights, please call 1-800-392-9998 or email us at [compliance@fiducient.com](mailto:compliance@fiducient.com). We may need to obtain additional information from you in order to confirm your identity before we release any personal information. Once your identity is verified, we will respond to consumer requests within 45 days or, if additional time is necessary to fulfil the request, notify the you that additional time is needed, up to 45 more days (90 days in total).

### **Will your Personal Information be kept Accurate, Complete and Up to Date?**

We will endeavor to ensure your personal information is kept accurate, complete, up to date and relevant. Please let us know if any of your details change. If you feel your personal information is not accurate, complete or up to date, please notify us and we will take reasonable steps to ensure it is corrected. You can contact us using the details listed below.

### **How We Protect Information**

Fiducient maintains physical, electronic, and procedural safeguards to protect your nonpublic personal information to ensure we comply with our own policy, industry practices, and federal or state regulations. If you ever become an inactive client, we will continue to adhere to the privacy policies and practices described in this notice.

As our Website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

*Links to Third-Party Websites.* As a convenience to you, Fiducient may provide hyperlinks to websites operated by

third parties. When you select these hyperlinks you will be leaving our Website.

Fiducient has no control over third party websites, their content, or security. Accordingly, when you access these third-party websites it is at your own risk. We encourage you to read the associated privacy policy by such third-party websites to learn more about their data privacy management practices. Fiducient may, in its sole discretion, block links to our Website and Content without prior notice.

### **Do We Use “Cookies” or Obtain Personal Information by Automated Means on Our Website?**

We may use “cookies” to help us tailor our Website to better suit your needs (for example, we may use cookies to enable us to save any personal preferences indicated by you) and to provide a more effective route to various components of our Website.

Cookies are small text files that are stored in your computer's memory and hard drive when you visit certain web pages. They are used to enable websites to function or to provide information to the owners of a website.

*Automated Decision Making.* Our Website contains cookies that function as an automated decision-making mechanism to determine user location.

*Third party cookies.* Third party cookies are cookies set by a website other than the website you are currently visiting. When you visit our Website, if we have link to third-party website, you may receive cookies that are set by that third party. These cookies are used for the purposes described in the bullet points above. We do not control the setting of these third-party cookies, so we suggest you might wish to check the third-party websites for more information about their use of cookies and how to manage them.

*Amending internet browser settings to disable cookies.* You can configure your browser to accept all cookies, reject all cookies, notify you when a cookie is set, or delete cookies that have already been set. Each browser is different, so check the “Help” menu of your browser to learn how to change your cookie preferences. You are free to decline our cookies if your browser permits, although in that case you may not be able to use certain features on our Website. In addition, a number of companies offer utilities designed to help you visit websites anonymously.

For more information about cookies and how to disable them please visit [www.allaboutcookies.org](http://www.allaboutcookies.org), or you may consult the vendor documentation for your specific software.

For more information on how our firm utilizes cookies, please refer to our Cookies Policy. A copy of our most current version of our Cookies Policy is available upon request or can be accessed on our Website at the link on the bottom of our homepage, or at the bottom of our other Website pages.

### **How do We Respond to Do Not Track Signals on Our Website?**

We do not track users across time or over multiple websites, we do not receive, or respond to, browser do-not-track signals or other similar mechanisms. However, as noted above, some third-party websites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you.

*Amending your internet browser's Do Not Track signal:* Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers and is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services.

To learn more about setting up a Do Not Track signal, please visit <https://allaboutdnt.com/>.

For more information on how our firm responds to Do Not Track signals, please refer to our [Cookie Policy](#).



### **Information about Children on Our Website**

Our Website is not directed to children under the age of 18 years. By using our Website, you represent and warrant that you are at least 18 years old.

If you are a parent or guardian and believe we may have collected information about a child under the age of 18, please contact us as described in the “Whom You Can Contact at Fiducient” section below so we can take reasonable steps to remove that information from our servers.

Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

### **Retention and Processing of Personal Information**

To the extent permitted by applicable law, we retain your personal information for the period necessary to serve the purposes for which we obtained it. We may also retain your personal information beyond such period in accordance with applicable laws, regulations, or another lawful basis, including but not limited to, compliance with our contractual obligations, legal obligations, regulatory obligations, legal claims, or another legitimate interest.

#### *Retention of Cookies*

When you visit our Website, we retain certain “cookies” for a period of time. For more information about how our firm retains cookies, please refer to our [Cookies Policy](#).

### **Data Transfers**

We may transfer the personal information we obtain about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. To the extent required by applicable law, when we transfer your information to recipients in other countries (such as the United States, United Kingdom, Ireland or Cayman Islands), we will protect that information as described in this Online Privacy Policy.

If you are located in the European Economic Area (“EEA”), we will comply with applicable legal requirements regarding the provision of appropriate safeguards for the transfer of personal information to recipients in countries for which the European Commission has not issued an adequacy decision.

## **Data Controller**

As identified under applicable law, the data controller for this Privacy Policy is Fiducient, located at the address below.

## **Whom You Can Contact at Fiducient**

We welcome your questions regarding our privacy policy. Please feel free to contact the Compliance Department via telephone at (312) 853-1000, via email at [compliance@fiducient.com](mailto:compliance@fiducient.com), or via regular mail at 500 West Madison Street, Suite 1700, Chicago, IL 60661.

## **Definitions**

**Affiliates:** Companies related by common ownership or control. They can be financial and nonfinancial companies. Specific affiliates include NFP Corp (“NFP”) and companies under a common ownership of NFP. More information about these relationships can be found in Fiducient’s Form ADV Brochure and Part 2A which is available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

- Fiducient does not share with any affiliate companies so they can market to you.

**Nonaffiliates:** Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- Fiducient does not share personal information with nonaffiliates so they can market to you.

**Joint Marketing:** A formal agreement between nonaffiliated financial companies that together market financial services to you.

- Fiducient does not jointly market.