## **Wealth Management Solutions Privacy Policy**

#### (Effective as of January 1, 2016)

Welcome to the Wealth Management Solutions website (the "Site"), which is operated by Wealth Management Solutions, LLC ("we" or "us"). The following **Privacy Policy** tells you about the information we, and our subsidiaries or affiliates, collect through the Site and in any other way. In addition, it explains how we use that information and how you can opt out of certain uses of information we may collect. By using our services, providing your personal information and/or accessing our Site, you are consenting to the information collection and use practices described in this statement, as modified from time to time by us. If this Privacy Policy is not acceptable to you, please do not use this Site or provide your personal information. If we decide to materially change our Privacy Policy, we will post a new statement on our Site. Therefore, we encourage you to check the date of our Privacy Policy whenever you visit this Site for any updates or changes.

#### Information About You

We collect several types of information about you. We collect "personal information" that you provide to us, which generally is information such as your first and last name, phone number and e-mail address that can be used to identify you individually. Our website may also collect "non-personal information," which is information about you that does not itself identify you individually. Examples of non-personal information include age range and gender. Additionally, our website may also collect your geographic location and other information to which you've granted permission available through any mobile, computer, or other device on which you access the Site. Your IP Address, operating system, hardware details, device settings, software, browser type, language, connection information, and other information may also be collected through your accessing our website. "Aggregate information," may also be collected which is information that helps us understand how people use our Site or our services, for example, which pages are visited, frequency of usage, paths of usage, interactions between users, and interaction with other software. The information collected depends on what services you use on our Site or otherwise. The following is a more detailed explanation of these types of information as well as when and how we collect and use them.

### **Contact Us Form**

When you complete the "Contact Us" form on our web site, we collect various kinds of personal information, including your first and last name, e-mail address, location, device type, and IP address.

## **Use of Your Personal and Non-Personal Information**

Except as disclosed in this Privacy Policy, we do not sell, rent, lease or disclose information that identifies you individually or makes it possible for other parties to contact you directly without your consent. Unless we have your permission or are required by law, we only share your personal information with our related companies and third parties who are acting on our behalf for the uses described below. We may, however, use, sell, disclose or otherwise dispose of personal information we collect in the following circumstances.

### **Data integrity**

We process personal information for the purposes for which it was collected and in accordance with this Privacy Policy. We review our data collection, storage and processing practices to

ensure that we only collect, store and process the personal information needed in connection with the uses set out in this Privacy Policy.

#### Internal Use of Your Information

We use all the information we have to help create and improve the Site for users. For example:

- We will use your phone number and email address to contact you our services.
- Information we have is used to improve safety and security for you and your content on your Site, including for violation of our terms and policies.
- We use information about you for statistical, design or operational purposes such as to estimate our audience size, to measure aggregate traffic patterns and/or to and understand demographics, customer interest, consumer insights, purchasing and other trends among our users and customers.
- We use cookies and other similar technologies to deliver and improve our Site as set forth herein under "Tracking Tools".

We may outsource all of these tasks to third parties on a confidential basis. If you do not want to receive promotional email or other materials from us or the third parties we have engaged, please unsubscribe when you receive an email or send your opt-out request to our Chief Compliance Officer at <a href="mailto:contact@wmsus.com">contact@wmsus.com</a> or 8550 E. Shea Blvd., Suite 130, Scottsdale, Arizona 85260.

### Disclosures to Comply with Legal Requirements

We may disclose personal information:

- (a) to conform with the law, respond to claims or comply with legal process served on us (e.g., a lawful subpoena, warrant or court order);
- (b) to enforce or apply our policies or agreements (including to initiate, render, bill and collect for amounts owed to us):
- (c) to protect and defend our or our users' rights or property, the Site, our employees, users or the public, including fraudulent, abusive or unlawful use of our Site; or
- (d) if we reasonably believe that an emergency involving immediate danger of death or serious physical injury to any person requires disclosure of communications or justifies disclosure of records without delay.

#### Choice

We will not use or share your personal information in ways unrelated to the uses described above without first notifying you and offering a choice. We will also provide you the opportunity to opt-out at any time of certain or all contact from us. If you have any difficulty exercising your choices, please send your request to <a href="mailto:contact@wmsus.com">contact@wmsus.com</a> or 8550 E. Shea Blvd., Suite 130, Scottsdale, Arizona 85260.

## **Company Sale**

Information collected through our Site is considered a trade secret owned by us. As the owner of such information, we may disclose or sell such information as an asset of the company in conjunction with the sale to a third party of our company or a portion of our assets.

### **Aggregate Information**

We collect aggregate information about you and your use of our Site whenever you visit our Site (See "Information About You" above). For instance, we may collect various forms of "click stream" information such as entry and exit points for our Site (i.e., referring URLs or domains), the sites you visit before and after ours, site traffic statistics, page views, impressions, and operating system and browser type. In addition, when you request pages on our Site, our servers automatically log your IP addresses. An IP address is a number that is automatically assigned to your computer whenever you are surfing the internet.

This aggregate information generally will not identify you or be correlated to you individually for external purposes. We may collect, compile, store, publish, promote, report, sell, or otherwise disclose or use any and all aggregate information provided that such information does not reveal your identity. When we share such information with other companies, it is not traceable to any particular user, and will not be used to contact you. If we do correlate any aggregate information to you, such information will be treated like any other personal information under this statement.

### **Tracking Tools**

We and our third-party vendors collect personal and other information about users over time and across different websites when you use this Site or the services offered on the Site. We use browser-based "cookies", users' IP addresses, and other technologies such as "pixel tags." "web beacons," "clear GIFs," or similar technologies to help us and third parties obtain information about your visits to the Site, deliver content for us and others specific to your interests, process your requests, and/or to analyze your visiting patterns, monitor traffic patterns on the Site, and to optimize and enhance your online experience on the Site. "Cookies" are pieces of information stored within your computer's or device's Internet browser that automatically identify your browser to our server whenever you interact with the Site. Such technology is a common feature of many web sites and is necessary in order for certain features of our site to function properly or in order to provide an online service to you. We also use cookies to help us understand the content that you are shown while visiting our Site. We may combine information which we obtain through the use of cookies with other information, including a unique identifier we have assigned to you, or with information we obtain from third party sources. Additionally, we use Google Analytics which collects aggregate data based upon your interaction with the Site and the URL that you visited immediately before you visited our Site, as well as the URL that you visit after our Site, the browser you are using and the user's IP address. We use this information to analyze trends, track user movement and use, gather broad demographic information and administer the Site. We reserve the right to provide aggregate statistics about our customers, sales, traffic patterns and related Site information to reputable third party vendors, but these statistics will not include any personal or identifying information. Please see https://www.google.com/analytics/standard/ for further information.

# **Managing Tracking Tools**

You may customize the browser settings to notify you when a cookie is sent or to disable cookies altogether. Please check your browser for instructions on how to make these adjustments. Because cookies allow you to take advantage of some of the Site's essential features, we recommend that you allow them on your browser. Your browser may also have a "Do Not Track" feature that lets you tell websites that you do not want to have your online activities tracked. These browser features are not uniform, so we are not currently set up to respond to those signals. If you don't wish to be tracked, please do not visit or submit information through the Site.

### **Links to Other Sites**

Please be aware that we provide links to third-party web sites as a service to our users, and that we are not responsible for the content or information collection practices of those pages. Please

note that these web sites' privacy policies may differ from ours. We encourage you to review and understand their privacy practices before providing them with information.

#### Children

Our Site is intended for a general audience. However, it is not designed nor intended to collect personal information from children under the age of 18. To respect the privacy of children and to comply with the Children's Online Privacy Protection Act, children under the age of 18 are not permitted to use the Site. We ask that parents supervise their children while online.

### Security

We are committed to safeguarding and securing your personal information. To maintain data accuracy, prevent unauthorized access to or disclosure of, and ensure the appropriate use of your personal information, we have put in place physical, electronic and managerial procedures. Such procedures represent our best efforts to maintain security and we work continuously to enhance security

### **Opting Out of Promotional Materials**

As noted above, we may use your e-mail address and other contact information provided to us through the Site to send notifications to you. If you do not want to receive such notifications, you can change your privacy preference and remove yourself from our notification e-mail list at any time. Please email such requests to <a href="mailto:contact@wmsus.com">contact@wmsus.com</a> or write to use at 8550 E. Shea Blvd., Suite 130, Scottsdale, Arizona 85260.

### **Access and Accuracy**

We strive to keep your personal information accurate. We will provide you with access to your personal information, including making reasonable efforts to provide you with online access to your subscription or registration data so that you may review, update or correct your information on the Site. To protect your privacy and security, we will also take reasonable steps to verify your identity before granting you access or enabling you to make corrections. To access your personal information, go to the settings/edit profile page either on the App or on the Site. If you cannot access your information on the Site, please send your request to <a href="mailto:contact@wmsus.com">contact@wmsus.com</a> or 8550 E. Shea Blvd., Suite 130, Scottsdale, Arizona 85260. We may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, would be extremely impractical or for which access is not otherwise required.

If you would like to change or delete your information you have provided us, please email us at contact@wmsus.com or write to us at 8550 E. Shea Blvd., Suite 130, Scottsdale, Arizona 85260.

Notwithstanding any preference that you select, we may contact you from time to time to provide services that you have requested or for customer service matters, such as responding to service-related inquiries, updating our policies or notifying you of changes to existing services.

If you have any questions about this Privacy Policy or our use of your information, or if you need help changing or deleting your information, you can e-mail us at <a href="mailto:contact@wmsus.com">contact@wmsus.com</a> or write to us at 8550 E. Shea Blvd., Suite 130, Scottsdale, Arizona 85260.

### California Privacy Policy

As a California resident you have the legal right to request from businesses with whom you have an established business relationship, (1) a list of the categories of personal information, such as your name, address, email address and the type of services provided to the customer, that a business has disclosed to third parties (including affiliates that are separate legal entities) during

the immediately preceding calendar year for the third parties' direct marketing purposes, and (2) the names and addresses of all such third parties. To request the above information, please email <a href="mailto:contact@wmsus.com">contact@wmsus.com</a> or write to us at 8550 E. Shea Blvd., Suite 130, Scottsdale, Arizona 85260 with a reference to California Disclosure Information.