



## **PRIVACY POLICY**

**Policy Owner: Chief Compliance Officer**

**EFFECTIVE DATE: NOVEMBER 8, 2017  
REVIEW CYCLE: ANNUAL (BY DECEMBER 31)**

Here at Marstone we are committed to maintaining the confidentiality, integrity, and security of personal information collected from our users. The privacy practices of this statement apply to services from Marstone Inc. and/or Marstone, LLC (hereinafter collectively, "Marstone") available under the domain [www.Marstone.com](http://www.Marstone.com) (the "Site"). By visiting this website, you agree to be bound by the terms and conditions of provided herein ("Privacy Policy"). This Privacy Policy describes the information that we collect from you as part of the normal operation of our services, and what may happen to that information. By accepting the Privacy Policy and the Client Agreement in registration, you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy is incorporated into and subject to the terms of the Marstone Terms of Use Agreement.

For the purpose of this Privacy Policy, a User is an individual who uses our website or mobile application to evaluate our service, or for educational purposes, and a Client is an individual who signs our Client Agreement that entitles the Client to have her or his investment portfolio managed by Marstone. This Agreement, as well as the Terms of Use, applies to both Users and Clients.

## **USER GENERATED CONTENT**

### **What information do we collect?**

- Information relevant to your computer, such as what type of device you are logging in from, the server from which you log-in, the IP address from which you log-in, and other types of anonymous information when you visit Marstone or provide us information to learn more about Marstone;
- Personal and financial information provided when you register with and/or become a Marstone client.

### **Why do we collect it?**

- Marstone is not only a technology provider but also a registered investment advisor for our clients. We are required by law to collect and maintain certain information under federal and state laws.
- We collect your personal information to maintain your Marstone account, provide and enhance our customer service, and bolster your customer experience.

- To improve your experience, we aggregate your personal information and perform certain analysis and reports. This analysis may include both identifying user trends and investment trends for both internal and external purposes. When we aggregate this information, we use our best efforts to ensure that the information is not identifiable to any single Marstone client.

## Definitions

Anonymized- to make anonymous. In other words, no one can figure out who you are with the information provided.

Aggregated- combining several elements to form a whole. Basically, we combine all of the content to form a whole bunch of data that cannot be traced back to any single individual.

## Using your data:

- We use your data to operate and maintain your account in accordance with US law;
- We use your data to monitor and protect the security and integrity of Marstone;
- We use the analytics performed by Marstone to better serve you and to market Marstone's products and service;
- If required by law, such as a court order, subpoenas, summons to disclose personal information we may do so;
- If we feel it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, such as front-running or scalping, situations involving potential threats to the physical safety of any person or markets, or violations of our Privacy Policy or Client Agreements;
- Marstone will use User information and content to provide you with information and services, to customize your experience on Marstone.com and to inform you about other products and services;
- We also aggregate and use User information and content in a manner to avoid providing any identifying information, to analyze and understand how our products and services are used, to deliver our products and services and to help us develop and innovate; and
- We may utilize all third party-retrieved information in order to optimize your utilization of our services, including offering, marketing, or recommending additional services. In instances where Marstone is acting as a subadvisor, you should also refer to the Privacy Policy of your advisor and their affiliated institutions concerning their use and disclosure of your information.

## Third Parties

- We do not sell, rent, or trade your personal information with any third parties. We may share your personal information with identification verification services, e-signature providers and account aggregation services.
- We may use third-party service providers to perform analytics and marketing services on your behalf.
- We may disclose some personal information but only aggregated and anonymized.

***All of these firms have entered into agreements that require that these third parties keep this personal information anonymized and confidential.***

#### Security

We take precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline.

Wherever we collect sensitive information, that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar and looking for "https" at the beginning of the address of the Web page.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment.

Information about our users, including personal information, may be disclosed or transferred to now existing, or future, entities affiliated with Marstone or those engaged as part of any merger, acquisition, change of control, financing, insolvency, bankruptcy or sale of our assets. Such information may be used in the businesses of any such entity receiving it. We may disclose personal information in specific other cases with your consent.

#### Analytics Services

We use Google Analytics to collect information about the usage of this site. This analytics service collects information relevant to your computer, such as what type of device you are logging in from, the server from which you log-in, the IP address from which you log-in, and other types of anonymous information when you visit Marstone, seek additional information from Marstone, and/or become a customer of Marstone. We use the information we get from these Analytics Services to improve our site and the services we provide to you through this site.

These Analytics Services only collect the IP address assigned to you on the date you visit this site, not your name or other identifying information. The Google Analytics Services' ability to use and share information about your visits to this site is restricted by their terms of use and privacy policies. We will never combine the information collected from this Analytics Services with the content you upload to Marstone as a client or user.

You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser. You can also opt out of Google Analytics by installing the Analytics Opt-out Browser.

## 2. HOW YOU ACCEPT THIS POLICY

By using the Marstone service, or otherwise providing us with personal information (such as an email address) you agree to the terms and conditions of this Privacy Policy.

### 3. CHANGES TO YOUR PERSONALLY IDENTIFIABLE INFORMATION

Once you have registered with Marstone, you can access your profile, review the information that is stored and revise some of that information. If you have technical problems, you can always contact us at [support@marstone.com](mailto:support@marstone.com). Due to US regulatory requirements, we do not delete residual copies of outdated information, and must preserve all consumer data for a minimum of three years.

If you wish to access or change the personal information that you have submitted to us or to request the correction of any inaccurate information you have submitted to us, you may do so via the website relating to your Marstone account. Alternatively, a Marstone Account Holder can request corrections to personal information by sending an email that includes your contact information to [accounts@marstone.com](mailto:accounts@marstone.com)

### 4. DELETING YOUR INFORMATION

We believe that your data belongs to you, and therefore, you may request deletion of your personal information at any time that you choose. To request that your account be deleted, please contact us at [support@Marstone.com](mailto:support@Marstone.com). We will remove your information as soon as reasonably practical, however we may need to retain and archive certain account information as required by applicable laws or regulations. Despite such removal, portions of your data may remain on our production and back-up servers indefinitely.

### 5. AS A VISITOR

We collect various types of anonymous information about visitors to Marstone, such as device-related information (browser type, IP address) and server log information (i.e. date and time you visited). We collect information that you input into our website and use this information to better understand our visitors and business, all to bolster the Marstone service.

### 6. CHANGES TO OUR PRIVACY POLICY

Please regularly review this Privacy Policy as we re-evaluate our privacy and security policies and update this Privacy Policy periodically as necessary to respond to new legal requirements, and to address other operational changes. The date last revised appears at the top of the Policy and changes take effect immediately upon posting. You agree to accept electronic communications and/or postings of revised versions of this Privacy Policy on [www.Marstone.com](http://www.Marstone.com), and agree that such electronic communications or postings constitute notice to you of the revised version of this Privacy Policy. If we make material changes to this Privacy Policy, we will notify you here, by email or by posting a notice on our site.

### 7. EMAIL OPT OUT

Marstone complies with the Controlling the Assault of Non-Solicited Pornography and Marketing Act of 2003 (CAN-SPAM). We may provide users with periodic website related notifications, marketing offers, or other information via email. You may elect to stop receiving such messages at your discretion by updating your account preferences on the website or through your Marstone account. You may also follow the unsubscribe instructions included in promotional emails. Please note that certain email messages we send users are necessary for the proper

functioning and use of services available through our website, and users who participate in such services do not have the ability to opt-out of such email messages.

## 8. CHILDREN'S ONLINE POLICY

The features, services, and other aspects of [www.Marstone.com](http://www.Marstone.com) requiring the submission of personally identifiable information are not intended for anyone under 18 years of age. We do not knowingly collect personally identifiable information from children under the age of 13 without parental consent. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed personally identifiable information to us, please contact us at [support@Marstone.com](mailto:support@Marstone.com).

## 9. SOCIAL MEDIA

This Privacy Policy and these terms apply to Marstone-operated services and applications. This Site may contain links that access other websites and apps that are not operated or controlled by Marstone. The policies described herein do not apply to third-party websites or applications.

## 10. QUESTIONS AND CONCERNS

If you have questions or concerns regarding this Privacy Policy, or if you have any questions, comments or feedback, please contact us at: [support@Marstone.com](mailto:support@Marstone.com).

For more general information regarding privacy you can visit the [Federal Trade Commission](#) which offers an overview of privacy protection.

<b>Version #</b>	<b>Effective Date</b>	<b>Written/Revised By</b>	<b>Approval By</b>
1.0	November 30, 2015	Marc B. Minor	Marc B. Minor, CCO
2.0	April 5, 2016	Marc B. Minor	Marc B. Minor, CCO
3.0	August 21, 2017	Marc B. Minor	Marc B. Minor, CCO
4.0	November 8, 2017	Marc B. Minor	Marc B. Minor, CCO