



## **Security Privacy Policy**

Last updated: 9/24/2015



At Wealth Access Inc. we know our clients and data partners expect us to preserve the privacy and confidentiality of their data while this information is within our control. The trust and confidence of our clients is our highest priority and we are committed to maintaining the confidentiality of all client information.

Wealth Access Inc. agrees that all nonpublic information transmitted to and received by Wealth Access Inc. from its clients or from any other interface source on our clients' behalf that has a duty to keep such information confidential, will be considered "Confidential Information". Confidential Information includes, without limitation, all lists of customers, former customers and prospective customers, and information relating to the accounts of these customers such as balances, asset positions, transactions, fees, pricing information, business methods, strategies and other data transmitted to Wealth Access Inc. for use in the provision of Wealth Access Inc. services.

Confidential Information shall be maintained in confidence by Wealth Access Inc. and shall not be used, duplicated, or otherwise disclosed to any third person, including employees of Wealth Access Inc. who do not need Confidential Information in order to perform services for clients. Wealth Access Inc. shall (a) hold all Confidential Information received from clients in confidence; (b) reproduce the Confidential Information only to the extent necessary to perform services for the client; (c) not knowingly disclose the Confidential Information to any third party without the prior written approval of client or as required by law; and (d) reasonably maintain Confidential Information in an appropriate and secure environment, both physically and electronically. Upon request of client, Confidential Information shall be returned the client or destroyed, as applicable, once the services contemplated by the agreement with the client have been completed.

If Wealth Access Inc. proposes to disclose Confidential Information to a third party in order to perform services requested by client under the client's agreement with Wealth Access Inc., Wealth Access Inc. will first obtain the consent of the client to make the disclosure. Upon the client's request, Wealth Access Inc. will enter into a confidentiality agreement with any such third party, under which that third party would be restricted from disclosing, using or duplicating such Confidential Information, except as consistent with the confidentiality agreement.

For many reasons, including the safety of Wealth Access Inc. assets and maintaining the privacy of client data, a formal information security incident response policy has been created and a privacy team has been established led by Mark Crockett. This team will respond to all potential security incidents, analyze, correct and, if needed, communicate the incident and the actions taken with Wealth Access Inc. employees, data partners and clients.



In the event of a privacy dispute, the parties agree to submit the dispute to mediation in accordance with the Commercial Mediation Rules of the American Arbitration Association ("AAA") and bear equally the costs of the mediation. The parties will act in good faith to appoint a mutually acceptable mediator, seeking assistance in such regard from the AAA. The parties agree to participate in good faith in the mediation and negotiations related thereto for a period of thirty days commencing with the selection of the mediator and any extension of such period as mutually agreed to by the parties.

We reserve the right to revise this Privacy Policy at any time. Each client agrees to be bound by any such revisions and should therefore periodically visit this document to determine the then-current privacy policy in effect.

#### **CONTACT INFORMATION**

If you would like to contact Wealth Access Inc. about data privacy or confidentiality issues, below is our contact information:

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Wealth Access Inc.  
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