

## Privacy Policy

Policy Effective Date: March 2, 2016

### Your Privacy Matters

Ethic's number one priority is your trust. Your privacy is essential to earning and keeping that trust. This tenet drives all of the decisions we make, as well as how we gather, use and store any information we acquire from you.

We created this Privacy Policy to be as clear and direct as possible about how we gather and use your information. To ensure your privacy we store your personal data ("Personal Data") on our own servers (i.e. not cloud-based hosting services). We avoid wherever possible using third-party cloud-based tools that require us to share your Personal Data to use them. We will never rent, sell or trade your personal information to anyone. Ever.

### Introduction

Ethic Inc. ("Ethic", "we", "us" and/or "our") operates an automated investment service ("Service"). Our Service is made available through our website and via applications that reside on mobile devices. This Privacy Policy describes how Ethic treats your Personal Data when you use or evaluate our service.

For the purpose of this agreement 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 Ethic. Our Privacy Policy, Terms of Use and where applicable Client Agreement collectively govern your use or evaluation of our service.

### Information Collection

The types of information we collect depend on whether you are a User or Client. We collect Personal Data from you when you voluntarily provide information to us. Examples of instances when we collect Personal Data include when you answer questions on our website to determine what kind of portfolio we might recommend if you were to become a Client, when you register to open an account, when you contact our client service organization with questions or when you become a Client. Wherever Ethic collects Personal Data, we make an effort to link to this Privacy Policy and other relevant terms, such as our Terms of Use.

### In General

Ethic's servers automatically record certain information ("Non-Identifiable" or "Aggregated Data") about your use or evaluation of our Service. Similar to other technology platforms and services, Ethic records information such as browsing activity, data displayed or clicked on (such as UI elements, ads, and links), and other information (such as browser type, IP address, date and time of access, cookie ID, and referrer URL). Along with cookies, Ethic may also use third-party tracking technology, such as Google Analytics and Segment.io to record similar information regarding you and your activity on the Site.

### Information Collection from Users

We collect personal information such as name, address, telephone number and other optional information you may provide, such as your age, investable assets, and risk tolerance, which may include your financial goals and objectives, income information and other financial planning information about your household.

We may collect your e-mail address and/or telephone number should you opt to engage via our website, mobile app, email or dedicated telephone number with our client service team.

We also collect account numbers and login credentials for the accounts (bank or brokerage) you choose to link to our Service, any challenge and/or security questions associated with those accounts and any information contained in those accounts.

### Information Collection from Clients

If you choose to become a Client, in addition to the information we collect from you as a User, as described above, we will ask you for certain information, including, but not limited to, your full legal name, contact information, birth date, Social Security Number, citizenship, investment objectives, approximate net worth, and other regulatory disclosures that may be necessary and required under Federal and certain statutory law.

### Acting As Your Authorized Agent

Ethic offers services where Ethic acts as an agent to retrieve your financial account information, such as your account balances, transactions and holdings, from financial institutions you designate.

By accessing and using the Ethic services you expressly authorize and direct Ethic, on your behalf, to electronically retrieve your account information maintained by third-party financial institutions with which you have a legally binding customer relationship ("Account Information"). Ethic may work with one or more third-party financial service technology providers to access and retrieve your Account Information.

Ethic is not responsible for and cannot guarantee the accuracy or timeliness of Account Information we retrieve on your behalf directly, from third-party technology providers, from third-party financial institutions where your accounts are held, or from third-party market data providers used to provide the Services.

### Use of Information

Ethic stores, processes, and maintains data related to you in order to provide client support, offer new products or services and provide our Service to Clients in accordance with the rules of regulatory bodies such as the Securities and Exchange Commission and FINRA. You may choose not to provide such information to us, but if you choose not to provide such information, you will not be able to become a Client.

We may share the information required to become a Client with our brokerage partner solely for the purpose of allowing our brokerage partner to provide services to you.

Ethic may use your Personal Data to communicate with you regarding our Service or to tell you about blog posts or services that we believe will be of interest to you. If you decide at any time that you no longer wish to receive marketing communications from us, please follow the “unsubscribe” instructions provided in the communications. Please note that you cannot opt-out of administrative communications such as regulatory, billing or service notifications.

#### Information Sharing and Onward Transfer

We will not sell, rent, or trade your Personal Data with any third parties except as required by law, such as when we reasonably believe it is necessary or appropriate to investigate, prevent, or take action regarding illegal activities, suspected fraud, front running or scalping, situations involving potential threats to the physical safety of any person, or violations of our Terms of Use.

There are certain circumstances, outlined below, in which we may share your Personal Data without further disclosure to you. From time-to-time, we hire other companies to perform certain business and technology related functions (e.g. mailing information, database maintenance and payment processing). In the case we hire another company to perform a function of this kind, we only provide them with the minimum information they need to perform their specific function. Ethic maintains strict procedural safeguards that comply with federal standards to guard your Non-Public personal information.

Except as required by law or requested by regulatory authorities, Ethic agrees to maintain your non-public Personal Data in strict confidence.

#### Your Choices and Obligations

You may request deletion of personal information by emailing [support@weareethic.com](mailto:support@weareethic.com) and providing us enough information to identify your account and prove that you are the owner of the identified account. We will endeavor to make any deletion request effective as soon as reasonably practicable. However, we may retain residual information related to your account, as well as any data related to your trades, in accordance with applicable laws. In no case will we share any individual trading data unless required by regulators or other government bodies.

You may decline to provide personal information to Ethic. Declining to provide personal information may disqualify you for Ethic services and Site features that require certain personal information.

#### Other Important Information

##### Security

Ethic takes reasonable steps to protect your Personal Data from loss, misuse, and unauthorized access, alteration, disclosure, or destruction. No Internet, email, or electronic operating system that enables the transmission of data is ever fully secure or error free so, please take special care in deciding what information you send to us in this manner.

## Advertising

We do not allow third-party advertising on our Website or Mobile applications.

## Referral Program

Ethic manages a referral program. Participation in our referral program is free and voluntary for our clients. By participating, you may provide us with certain information about the person to whom you refer our service, such as name and e-mail address. We treat this information like all our other Personal Data.

## Social Media and Links to Other Web Sites and Apps: "Third Parties"

This Privacy Policy and these terms apply only to Ethic operated services and applications. This Site may contain links that access other web sites and apps that are not operated or controlled by Ethic. The policies described herein do not apply to Third Party websites or applications.

## Minors

Ethic is not to be used by anyone under the age of 18 and, as such does not knowingly collect Personal Data from anyone under the age of 18. If you are under the age of 18, please do not submit any Personal Data to Ethic. If a parent or guardian becomes aware that his or her child under the age of 18 has provided us with personally identifiable information without his or her consent, he or she should contact us at [support@weareethic.com](mailto:support@weareethic.com) and we will delete such information from our files.

## Other

This Privacy Policy may change from time to time. We will post any Privacy Policy changes and, if the changes are substantial, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes). Each version of this Privacy Policy will be identified at the top of the page by its effective date.

This document constitutes Ethic's complete Privacy Policy for Ethic and the Services.

If you have questions or comments about this Privacy Policy, please email us at [support@weareethic.com](mailto:support@weareethic.com).