

# PRIVACY POLICY

Welcome to Plectrum Accelerate! Plectrum Accelerate is an investment tool that uses TD Ameritrade (“TD”) as its custodian. Plectrum Accelerate is integrated with TD to help you begin securely investing.

## Introduction

This Privacy Policy outlines the types of personal information that Plectrum Accelerate, and Plectrum Advisers, LLC (collectively “Plectrum Accelerate”) collect, including through Plectrum Accelerate’s websites, <https://PlectrumAcceleratefinancial-2856857.twentyoverten.com> and [www.plectrumadvisers.com](http://www.plectrumadvisers.com) (“Site”), and our Plectrum Accelerate mobile application (“App”). It also explains why we collect your information and how we use it.

Privacy is important to Plectrum Accelerate. If you have any questions or if you believe that Plectrum Accelerate has not adhered to this Privacy Policy, please send us a note at [tom@plectrumadvisers.com](mailto:tom@plectrumadvisers.com).

## Information We Collect and Why

In order to provide a high-quality service, Plectrum Accelerate collects various types of information when you visit the Site or App, sign-up as a client, or otherwise engage with Plectrum Accelerate.

## Visitor Information

We collect various types of anonymous information about visitors to Plectrum Accelerate, such as device-related information (including browser type and IP address) and server log information (including the date and time of day of your visit, average time spent on the Plectrum Accelerate Site, browsing activity, and any site that referred you to Plectrum Accelerate). We also collect information that you input into our App or Site, e.g., by beginning the account application process or by communicating with us through our live chat integration. We use this information to better understand our visitors and our business, facilitate site navigation, provide the services or information you request, and improve our website and App to enhance the service we provide you.

## Client Information

When you choose to create an account with Plectrum Accelerate, you will take a survey to help us understand your risk capacity. During the creation of your account and completion of the survey, we collect certain personal information, including your full legal name, phone number, email address, physical address, date of birth, social security number, citizenship status, and information about your financial status (such as employment status, occupation, liquid net worth, annual income, and financial goals). We are required by law to collect this information to provide you with financial services. You can choose to not provide us with this information, however, by not providing this information, you will be unable to become a Plectrum Accelerate client.

You may also choose to provide your bank account information when creating a Plectrum Accelerate account. Doing so allows you to enable TD’s Move Money form to transfer both a monthly amount and an initial contribution amount from your checking account to the newly created brokerage account at TD.

## Other Ways We Collect Information

Through the account-opening process and from visitors to the Site, we may collect various other types of personal information if you engage with Plectrum Accelerate. We may collect personal information if you enter it into our live chat feature or contact us or otherwise give it to us (e.g., in an email, phone call, or live chat with a member of our customer support team). We may also collect information regarding your browsing activity

when you visit Plectrum Accelerate's Site and actions you take within your Plectrum Accelerate account while logged in to your Plectrum Accelerate account.

## **Cookies and Pixels**

Cookies are small files that a website transfers to your computer, mobile phone, or other device used to access the internet, through your web browser (if you allow) that enables the site's systems to recognize your browser and capture and remember certain information.

Pixels are small graphic files that allow us to monitor the use of our Sites. A pixel can collect information such as the Internet Protocol ("IP") address of the computer or device that downloaded the page on which the pixel appears; the URL of the page on which the pixel appears; the time the page containing the pixel was viewed; the type of browser that fetched the pixel; and the identification number of any cookie on the computer or device previously placed by that server.

We use these technologies to customize Plectrum Accelerate and improve your experience with the App and Site. Cookies store anonymous information, such as whether you viewed the site from your mobile device. We may store some personal information in a cookie and/or pixel, such as the site that you visited immediately prior to visiting Plectrum Accelerate and relevant financial information that allows us to enhance your user experience and for marketing purposes. Additionally, we may use a cookie and/or pixel that only stores anonymous information to track visitors across websites to better customize our marketing and advertising campaigns.

Cookies, pixels, and similar technologies are not required for site functionality. You are not required to accept any cookies or pixels to use this Site.

## **Advertising Companies**

Plectrum Accelerate advertises our services on websites not affiliated with Plectrum Accelerate, and we contract with third-party advertising companies to display these ads. These third-party advertising companies, along with data exchanges and similar providers, may use cookies and similar technologies to collect technical and web navigational information, such as device type, browser type, IP address, and pages visited. We do not provide any information to these advertising companies that could personally identify our users or clients, and they do not collect such information for us.

Plectrum Accelerate and third-party advertising companies may use the data collected to provide you with ads relevant to you and personalized content while you are on Plectrum Accelerate or other sites. If you prefer to not receive targeted advertising, you can opt out of some network advertising programs that use your information by visiting the [NAI Opt-Out Page](#). Please note that even if you choose to remove your information by opting out, you will still see advertisements while you are browsing online.

Additionally, many network advertising programs allow you to view and manage the interest categories they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive. The [NAI Opt-Out Page](#) provides a tool that identifies its member companies that have cookies on your browser and provides links to those companies.

Because mobile devices may vary in how they operate and may not use cookies, the choice management options listed above may not work for all mobile devices and mobile apps.

## **Analytics Services**

We use third-party analytics tools, including "Google Analytics" (such tools collectively referred to as

“Analytics Services”) to collect information about the usage of this Site. The Analytics Services collect information about how often users visit this Site, what pages they visit when they do so, and what other sites they used prior to coming to this site, among other information. We use the information we get from these Analytics Services to improve this site.

These Analytics Services collect the IP address assigned to you on the date you visit this site, along with other anonymized information (e.g., browser type and type of device used to visit the site), but not your name or other personally identifiable information. The 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 do not combine the information collected through the use of Google Analytics with personally identifiable information.

You can prevent Google Analytics from recognizing you on return visits to this Site by disabling cookies on your browser. You can opt-out of Google Analytics by installing the Google Analytics Opt-out Browser Add-on [here](#).

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

Plectrum Accelerate uses your personal information to enhance your customer experience, provide customer support, operate and maintain your account in accordance with US law, investigate and understand how Plectrum Accelerate is used, monitor and protect the security and integrity of Plectrum Accelerate, and better market and advertise Plectrum Accelerate’s services. You understand and agree that Plectrum Accelerate will compare your identifying information with government-provided lists of suspected terrorists.

As part of this process, we may from time to time include, compile, or aggregate some of your personal information in certain data analysis, reports, or other interpretations of investment trends for both internal and external purposes. When including, compiling, or aggregating personal information for such purposes, we make sure that the information is anonymized such that it is not identifiable to any particular customer.

Additionally, we may use your personal information to contact you regarding our services or resources that we think may interest you. If you no longer wish to receive these types of marketing communications from Plectrum Accelerate, please click the “unsubscribe” link that can be found at the bottom of each such email message. Please note that if you hold an account with Plectrum Accelerate, you cannot opt-out of certain communications related to the administration of your account, including communications related to billing, statement and trade confirmation delivery or certain regulatory matters.

## **How We Share Your Information**

We may share or disclose non-personal, aggregated information such as demographic information, the characteristics of a device or its user when it is available to receive an ad; or aggregated or device-level reports to advertisers about users who saw or clicked on their ads. This information does not include your name, email address, phone number, social security number, bank account number, or any other sensitive information. We may, however, share non-personal, aggregated, or device-level information through third-parties that may use data in their possession (including data you may have given them through other online experiences) to link your name, email address, or other personal information to the information we provide them. These third-party entities require that they get your consent before doing so.

In order to provide financial services and in connection with our everyday business purposes and activities, we may share your personal information with third parties who perform services on our behalf. Examples of these third parties and services include consumer identification verification services, public accounting firms and other professional firms, and certain other vendors and service providers who perform marketing, advertising, research and analytics services on our behalf. We have entered into agreements that require that these third

parties keep this information confidential. We may also disclose your information to other third-party financial institutions, e.g., if you ask to transfer assets from Plectrum Accelerate to such financial institutions.

We may also disclose personal information in response to service of legal process, such as a court order, summons, or subpoena, or as permitted or required by law when we reasonably believe it is necessary or appropriate to investigate, prevent, or take action regarding illegal activities, suspected fraud (including identity theft), frontrunning or scalping, situations involving potential threats to the physical safety of any person, or suspected violations of our Terms of Service or customer agreements.

Furthermore, we may disclose personal information in specific other cases with your consent.

## **How Your Personal Information is Protected**

Plectrum Accelerate works diligently to protect your personal information. We employ several physical and electronic safeguards to keep your information safe, such as regular Malware Scanning, and website scanning for security holes and known vulnerabilities. We use the strongest available browser encryption, store all of our data on servers in secure facilities, and implement systematic processes and procedures for securing and storing data.

We limit access to your personal and financial information to only those employees with authorized access who need to know the information in order to perform their jobs, and we require third parties who perform services for Plectrum Accelerate to agree to keep your information confidential. Furthermore, if you choose to close your account or your account is terminated with us, we will continue to adhere to the privacy policies and practices outlined here. If you maintain a Plectrum Accelerate account that you access through our Site or App, you are responsible for protecting and maintaining the confidentiality of your account and password and restricting access to your computer.

## **Fair Information Practices**

In order to be in line with Fair Information Practices, should a data breach occur, we will notify you via email and through an in-App or in-Site notification within 7 business days.

## **How You Can Access or Change Your Personal Information That We Have Collected**

Once you have registered with Plectrum Accelerate, you can access your profile, review the information that is stored, and revise that information. If you have any problems, you may also contact us at [tom@plectrumadvisers.com](mailto:tom@plectrumadvisers.com). Due to US regulatory requirements, we do not delete residual copies of outdated information and must preserve all customer data for a minimum of three years.

## **Other Important Information**

### **Former Clients**

If you are a former client, these policies also apply to you; we treat your information with the same care as we do information about current clients.

### **How We Respond to Do Not Track Signals**

Online tracking is the collection of data about an individual's Internet activity used to deliver targeted advertisements and for other purposes. Customers using certain modern browsers have the ability to activate a "Do Not Track" signal. Plectrum Accelerate does not currently respond to the "Do Not Track" requests.

## **How You Accept This Policy**

By using and continuing to use the Plectrum Accelerate Site, App, and/or services, or otherwise providing us with personal information (such as an email address) you agree to the terms and conditions of this privacy policy and any updates thereto. This policy may change from time to time. This is our entire and exclusive privacy policy and it supersedes any earlier version. Our [Terms of Use](#) take precedence over any conflicting privacy policy provision.

## **Changes to the Policy**

We may modify this Privacy Policy over time without prior notice by posting a new version of this Privacy Policy, which is your responsibility to review. Any changes to the Privacy Policy will be reflected on this page and will become effective immediately upon posting. We encourage you to periodically review this Privacy Policy to stay informed about how we are protecting the personally identifiable information we collect. If changes to the Privacy Policy are material, we will notify you via email or through a notification on the Site or App. Please check the effective date below to determine if there have been any changes since you have last reviewed the Plectrum Accelerate Privacy Policy.

## **CAN-SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to send information and respond to inquiries. To be in accordance with CAN-SPAM, we agree to not use false or misleading subjects or email addresses, identify the message as an advertisement in some reasonable way, include the physical address of our business headquarters, honor opt-out/unsubscribe requests quickly, and allow users to unsubscribe by using the link at the bottom of each email.

## **Children**

Our service is not directed towards anyone under the age of 18. If a parent or guardian becomes aware that his or her child under the age of 18 has created an account with Plectrum Accelerate and/or provided us with personally identifiable information, please contact us at [tom@plectrumadvisers.com](mailto:tom@plectrumadvisers.com). Additionally, if we become aware at any point that a child under the age of 18 is using our service, we will terminate his or her account.

## **California Online Privacy Protection Act**

CalOPPA is the first state law in the nation to require online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company that collects Personally Identifiable Information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared.

## **Your Rights as a California Resident**

Residents of California have the right to request from us certain information with respect to the types of personal information we share with third parties for those third parties' direct marketing purposes and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To exercise your rights, you may make one request each year by emailing us at [support@betterment.com](mailto:support@betterment.com). Your request should specify your full name and the email address you used when submitting personal information to us.

## **Your Rights as a Vermont Resident**

We do not share nonpublic personal financial information we collect about Vermont residents to non-affiliated third parties except for our everyday business purposes or as otherwise permitted by law. If you wish to revoke any authorization to share your nonpublic personal financial information, which you have provided to us by entering into our Customer Agreement, please contact us at [support@betterment.com](mailto:support@betterment.com). Please note, however, that we will not be able to provide you with services through Plectrum Accelerate without the ability to share this financial information.

## **International Visitors**

This Service is hosted in the United States. If you are an international visitor, you should note that by providing your personal information, you are: (i) permitting the transfer of your personal information to the United States which may not have the same data protection laws as the country in which you reside; and (ii) permitting the use of your personal information in accordance with this privacy policy.

The Platform and its servers are operated in the United States and elsewhere. Please be aware that your Information, including your Personal Information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use the Platform, you hereby irrevocably and unconditionally consent to such transfer, processing, and use in the United States and elsewhere.

## **Questions**

If you have any questions on the privacy policy, please contact us at:

### **Plectrum Accelerate**

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**LAST AMENDED DATE:** May 22, 2018