

## Privacy Policy

**Last Revised: November 6, 2018**

FeeX Inc. (including its affiliates) ("FeeX", "we" or "us") respects the privacy of the users ("User" or "you") and is committed to protect the personal information that its Users share with it. We believe that you have a right to know our practices regarding the information we may collect and use when you use our Service (as such terms are defined in our [Terms of Use](#) (the "TOU")). Capitalized terms which are not defined herein, shall have the meaning ascribed to them in the TOU, which this Privacy Policy is incorporated thereto by reference. FeeX is committed to maintaining the confidentiality, integrity and security of any personal information about FeeX Users. This Policy also explains how we protect personal information provided through the Services and how we use that information in connection with the products and services offered through the Site.

### **1. Your Consent (PLEASE READ CAREFULLY!)**

BY ENTERING TO, CONNECTING TO, ACCESSING OR USING THE SERVICE, AND/OR BY GRANTING US ACCESS TO THE DATA (AS SUCH TERM IS DEFINED IN THE TOU) YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY (THE "PRIVACY POLICY"), INCLUDING TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION (AS DEFINED BELOW). IF YOU DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MAY NOT USE THE SERVICE AND/OR DO NOT GRANT US ACCESS TO THE DATA.

THE FEEEX SERVICES ARE NOT INTENDED FOR USE BY NON-US PERSONS (AS DEFINED IN THE TERMS OF USE). BY ENTERING TO, CONNECTING TO, ACCESSING OR USING THE SERVICE, AND/OR BY GRANTING US ACCESS TO ANY DATA, YOU HEREBY REPRESENT THAT YOU ARE NOT A NON-US PERSON.

IF YOU ARE A PROFESSIONAL ADVISOR USING THE SERVICE ON BEHALF OF A CLIENT TO WHOM YOU PROVIDE PROFESSIONAL ADVICE, YOU WARRANT THAT SUCH CLIENT HAS READ AND AGREED TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY, INCLUDING TO THE COLLECTION AND PROCESSING OF THEIR PERSONAL INFORMATION. FURTHER, YOU REPRESENT THAT NEITHER YOU NOR YOUR CLIENT(S) ARE A NON-US PERSON.

### **2. Which information we may collect on our Users?**

We may collect two types of data and information from our Users:

1. The first type of information is non-identifiable and anonymous information ("Non-Personal Information"). We are not aware of the identity of the User from which we have collected Non-Personal Information. Non-Personal Information is any unconcealed information which is available to us while Users are using the Service. Non-personal Information which is being gathered consists of technical information and behavioral information, including, but not limited to, the User's operating system, type of browser, screen resolution, the User's 'clickstream' on the Site, the period of time the User visited the Site, etc.
2. The second type of information is individually identifiable information ("Personal Information"). This information may identify an individual or may be of a private and/or sensitive nature. Personal Information which is being gathered consists of any personal details provided consciously and voluntarily by the User:
  - User's contact and account information such as name, state of domicile, and/or email address;
  - User's IP address;
  - User's information relating to investment preferences and strategy, such as age, time horizon, risk tolerance, net worth and desired filtering priorities for viewing investment choices from different financial service providers;

Additionally, we may also collect and store financial data from your individual retirement account(s), 401(k) plan and other workplace retirement plan accounts, brokerage accounts and mutual fund accounts, including account numbers, account access information, identity of financial service providers, investment holdings, fee billings and deductions, fee disclosure documents, purchases, sales and other transactions.

Please note that if you choose to provide FeeX with Data through the "Link Accounts" option, FeeX will only use your respective log-in credentials in order to retrieve the Data you have authorized FeeX to retrieve.

In the course of providing the Service FeeX may learn demographic information about you such as employment history, savings and investment history, educational attainment, gender and interests.

We will not collect any Personal Information from you without your approval which is obtained, inter alia, through Your acceptance of the TOU and the Privacy Policy.

Your Data is used in order to provide the Service provided in the Site.

### **3. How Do We Collect Information on Our Users?**

There are two main methods we use:

1. We collect Non-Personal Information through your use of the Service. In other words, when you are using the Service we are aware of it and may gather, collect and record the information relating to such usage, either independently or through the help of third-party services as detailed below
2. We may collect Personal Information which you provide us voluntarily. We may collect Personal Information required to operate the Service when you or someone acting on your behalf register and open a User Account by completing the registration form. In addition, we collect your personal financial information (i.e, the Data), which may be considered as personally identifiable, whether you provide us such information by entering it manually or via the "Link Accounts" (or "Connect Automatically") option, by providing us with the access to your financial institutions' accounts, or by signing up for certain paid Services.

### **4. What are the Purposes of the Collection of Information?**

Non-personal Information is collected in order to:

- Create aggregated statistical data for research purposes and customization and improvement of the Service.

Personal Information is collected in order to (only when applicable):

- Operate the Service (i.e. receive the relevant information regarding the fees the User is paying for financial products or services in his or her financial portfolio, process such information through our proprietary technology and provide the Users with optimal fees information).
- Be able to contact Users for the purpose of providing them with technical assistance, reminders and other related information to the Service and collect feedback regarding the Service.
- In the event that the User provided his/ her age to FeeX, FeeX will use it to provide the User with the Service (including determining years left for retirement).
- For market research, project planning, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity.
- To provide to third-party contractors that provide services to FeeX in order for such third-party contractors to perform their services.

- For risk control, for fraud detection and prevention, to comply with laws and regulations, and to comply with other legal process and law enforcement requirements.
- To enforce FeeX's [Terms of Use](#).

## 5. Sharing Information with Third Parties

FeeX may disclose Personal Information with TD Ameritrade. Except as set forth below, FeeX will not share Personal Information with any other third party. FeeX may disclose Personal Information to other third parties in the following cases: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy Policy and/or the TOU, including investigation of potential violations thereof; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to respond to User's support requests; (e) respond to claims that any content available through the Services violates the rights of third-parties; (f) to respond to claims that contact information (e.g. name, e-mail address, etc.) of a third-party has been posted or transmitted without their consent or as a form of harassment; (g) to protect the rights, property, or personal safety of FeeX, its Users, or the general public; (h) when FeeX is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of its assets; (i) to FeeX's authorized third party service providers that provide services to FeeX in order for such third-party contractors to perform their services (for example, Amazon Web Services), as reasonable for business purposes, which may be located in a country that does not have the same data protection laws as your jurisdiction; (j) to collect your personal Data through the means of a third party service provider who will use your log-in credentials for such purpose, if you choose to use the "Link Accounts" option; (k) pursuant to your explicit approval prior to the disclosure; or (l) to provide User with FeeX certain features or services . For avoidance of doubt, FeeX may transfer and disclose Non-Personal Information to third parties at its own discretion. FeeX requires commercial entities with which we share your Personal Information (as described above) to agree to keep your information confidential.

## 6. Modification or Deletion of Personal Information

If for any reason you wish to modify your Personal Information (such as accounts linked through the Service) you may do so on the FeeX site by clicking the "Settings" option. In order to delete your Personal Information completely please send us an email to: [support@feex.com](mailto:support@feex.com), and we will make reasonable efforts to delete any such Personal Information within a reasonable timeframe following your request pursuant to any applicable privacy laws, however subject to regulatory requirements with respect to the retention of certain financial related records. If you wish to subscribe to our updates on your accounts, we will use your name and email address to send the newsletter to you. Out of respect for your privacy, you may choose to stop receiving our updates or marketing emails by following the unsubscribe instructions included in these emails,

accessing the email preferences in your account settings page or you can contact us at the information below.

However, please note that although your Account and Personal Information related thereto may be removed from our databases, FeeX will retain the anonymous information contained in the Data you provided, and such information will continue to be used by us for the purpose of operating the Service, i.e. use such information for fees comparison requested by other Users.

## **7. Cookies & Local Storage**

When you access or use the Service, Company may use industry-wide technologies such as "cookies" or similar technologies, which stores certain information on your computer ("Local Storage") and which will allow us to enable automatic activation of certain features, and make your Service experience much more convenient and effortless. The cookies used by the Service are created per session and registration does not include any information about you, other than your session key (usually removed as your session ends) and the ability to login again quickly. It is easy to prohibit the Local Storage. Most browsers will allow you to erase cookies from your computer's hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you block or erase cookies your online experience with the Service may be limited.

## **8. Security**

We take a great care in implementing and maintaining the security of the FeeX Services and our Users' Personal Information. The Personal Information is hosted on the Amazon Cloud which provides advanced security features. FeeX employs industry standard procedures to ensure the safety of its Users' Personal Information, and prevent unauthorized use of any such information. However, we do not guarantee that unauthorized access will never occur.

## **9. Third Party Software/Service**

While using the Service we may be using third party software and/or services, in order to collect and/or process the information detailed herein and/or improve our service. Such software includes without limitation;

- i. Google Analytics, which privacy policy is available at:  
<http://www.google.com/intl/en/analytics/privacyoverview.html>
- ii. Tableau, which privacy policy is available at:  
<http://www.tableau.com/privacy>
- iii. Envestnet Yodlee, which privacy policy is available at:

<https://www.yodlee.com/legal/privacy-notice/>

iv. Snowplow, which privacy policy is available at: <https://snowplowanalytics.com/privacy-policy/>

## **10. Changes to the Privacy Policy**

The terms of this Privacy Policy will govern the use of the Service and any information collected therein. FeeX reserves the right to change this policy at any time, so please revisit this page frequently. We will provide notice of substantial changes of this policy on the homepage of the Site. Such substantial changes will take effect seven (7) days after such notice was provided on our website or sent by email. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" date and your continued use of the Services after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes.

## **11. Have any Questions?**

If you have any questions (or comments) concerning this Privacy Policy, you are welcome to send us an email or otherwise contact us to the following address and we will make an effort to reply within a reasonable timeframe: [support@feex.com](mailto:support@feex.com)