

Online Privacy Policy

Effective as of June 1, 2021

This Privacy Policy describes how we collect, use and share your personal information if you:

- Use our websites at www.broadridge.com, www.rampartwealthmanagement.com or our other websites that link to this Privacy Policy (collectively, the “**Site**”);
- Use our mobile applications (collectively, the “**App**”);
- Use our financial advisory services or are eligible to access them as an employee benefit (“**Client Services**”); participate in our events, consumer research or other activities where this Privacy Policy is posted; or
- Receive our marketing communications or engage with us on social media services.

Privacy Notice

[View the Privacy Notice of Rampart Wealth Management LLC](#)

We refer to the Site, the App, the Client Services and other activities described above, collectively, as the “**Service**“

This Privacy Policy covers the following affiliated companies in Rampart Wealth Management family of companies.

In some cases we may provide a different privacy policy for a particular event or service, in which case that privacy policy will apply in accordance with its terms.

We provide important information for California residents below.

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Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise, or that we obtain from your employer, includes:

- **Contact data**, such as your first and last name, email and mailing addresses, residence, postal code, phone number, professional title and company name.
- **Profile data**, such as your username and password that you set to establish an online account with us, age, gender, biographic details, interests, preferences, intended time of retirement, and information that may be related to a service, account or an event you register for.
- **Identity data**, such as a national identification number (e.g., social security number where permitted, tax identification number, passport number, state or local identification number (e.g., driver's license or state ID number), and an image of the relevant identification card.
- **Communications** that we exchange when you contact us with questions, feedback, or otherwise.
- **Financial data**, such as your income, economic or financial status, financial institution, financial account details, investment holdings and preferences, investment changes, account balances and contributions, and ability to invest.
- **Payment and transactional data**, such as the information needed to complete your orders on or through the Service (including name, contact information, credit card information, and billing information), and information about payments to and from you and other details of products or services you have purchased from us, and information that you provide us in subscription agreements,

investor questionnaires or other documents prepared in connection with the Client Service.

- **Marketing data**, such as your preferences for receiving communications about our products, activities, events, and publications, and details about how you engage with our communications.
- **Other information** that we may collect which is not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Data from other sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Data providers**, such as information services and data licensors.
- **Public sources**, such as social media platforms.
- **Business partners**, such as joint marketing partners and event co-sponsors.
- **Our clients**, such as your employer when they engage us to provide Client Services as a benefit to its employees.

Data collected automatically. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your activity over time on the Sites and other online services, such as:

- **Device data**, such as your computer or mobile device operating system type and version number, manufacturer and model, browser type, screen resolution, IP address, the website you visited before browsing to our website, and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.
- **Precise geolocation data**, such as your location if using a mobile application and you consent to provide it.

Cookies and similar technologies. Like many online services, we use the following technologies:

- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns, and facilitating online advertising.
- **Flash cookies**, or locally-stored objects, which are used on websites for purposes similar to cookies but allow storage of a larger amount of data.
- **Web beacons**, also known as pixel tags or clear GIFs, which are typically used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked, typically to compile statistics about usage of websites and the success of marketing campaigns.
- **Software development kits**, or SDKs, which are used to incorporate third party computer code into our App that allows our third party service providers or advertising partners to collect data directly from it for a variety of purposes, including to provide us with analytics regarding the use of the App, to integrate with social media, add features or functionality to our app, or to facilitate online advertising.

Information about others. Users of the Service may have the opportunity to refer friends or other contacts to us and share their contact information with us. Please do not refer someone to us or share their contact information with us unless you have their permission to do so.

How we use your personal information

We use your personal information for the following purposes:

Service Delivery. We use your personal information to:

- provide, operate and improve the Service;
- execute your transactions;

- establish and maintain your user profile on the Service;
- enable security features of the Service, such as by sending you security codes via email or SMS, and remembering devices from which you have previously logged in;
- communicate with you or your employer about the Service, including by sending announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications;
- provide support for the Service; and
- respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

Marketing and advertising. We and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** We may send you Rampart Wealth Management - related or other direct marketing communications as permitted by law. You may opt-out of our marketing communications as described in the Opt-out of marketing section below.
- **Interest-based advertising.** We may contract with third-party advertising companies and social media companies to display ads on our Service and other sites. These companies may use cookies and similar technologies to try to tailor the ads you see online to your interests based on your activity over time across our Service and other sites, or your interaction with our emails. These ads are

known as “interest-based advertisements.” You can learn more about your choices for limiting interest-based advertising, in the Advertising choices section below.

Compliance and operations. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others’ rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements and internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection:

Affiliates. We may share personal information about you with our affiliated companies for everyday business purposes, however, our affiliated companies are not permitted to use this information to market their products or services to you. Additionally, we do not share information with our affiliated companies regarding your creditworthiness.

Please see our [Privacy Notice](#) for more information on how your information may be shared.

Service providers. Companies and individuals that provide services on our behalf or help us operate the Service or our business (such as IT, hosting, investment trading, customer relationship management and support, print and mail fulfillment, data management, event registration, email delivery, marketing, website analytics, and event management services).

Service-related third parties. Brokers, custodians, administrators, investment funds and their respective managers and other non-affiliated third parties as necessary to provide the Service.

Advertising partners. Third party advertising companies that collect information about your activity on the Site and other online services to help us advertise our services, and/or use hashed customer lists that we share with them to deliver ads to them and similar users on their platforms

Professional advisors. Professional advisors, such as lawyers, auditors and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the compliance and operations purposes described above.

Business transferees. Relevant participants in business transactions (or potential transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, Rampart Wealth Management or our affiliates (including, in connection with a bankruptcy or similar proceedings).

Your Choices

You have the following choices with respect to your personal information.

Access or update Your Information. If you have registered for an account with us, you may review and update certain account information by logging into the account.

Opt-out of marketing communications. You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us. You may continue to receive service-related and other non-marketing emails.

Cookies Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Service may not work properly. For more

information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org.

Privacy settings and location data. Users of our App can disable our access to their device's precise geolocation in their mobile device settings.

Advertising choices. You may opt out of receiving targeted online advertising on websites through members of the Network Advertising Initiative by clicking [here](#) or the Digital Advertising Alliance by clicking [here](#). You may opt out of receiving targeted advertising in mobile apps through participating members of the Digital Advertising Alliance by installing the AppChoices mobile app, available [here](#), and selecting the user's choices. Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms linked above.

In addition, your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for targeted online advertising purposes. If you choose to opt out of targeted online advertisements, you will still see advertisements online but they may be less relevant to you. Not all companies that serve interest-based ads participate in these opt out programs, so even after opting out through them, you may still receive some cookies and interest-based ads from other companies that are not listed.

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information requested, we may not be able to provide those services.

Third party services. We give you the option to use Plaid Inc. ("Plaid") to gather your account data from financial institutions. You are not required to use Plaid to receive services from us. By using the Service and selecting Plaid to gather your outside account data, you grant us and Plaid the right,

power, and authority to act on your behalf to access and transmit your personal financial information from the relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with Plaid's [Privacy Policy](#).

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or in mobile applications or other online services that are not associated with us. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions.

Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers with operations in other countries, where privacy laws may be of a standard more or less protective as those in your state or the United States generally. Our service providers may have access to the personal information we collect about you during the course of our contractual relationship with them in order to provide their services or products. It is our practice however to enter into written agreements with our service providers that impose data protection obligations no less protective than our own

Children

The Service is not intended for use by children under 16 years of age. If we learn that we have collected personal information from a child under 16 without the consent of the child's parent or guardian as required by law, we will delete it.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. If required by law we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail or another manner through the Service. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the modified Privacy Policy.

How to contact us

You can reach us in the following ways:

- **Mail:** Rampart Wealth Management, Village West 2, Suite 924, 38 Country Club Rd, Giford, NH 03253, Attention: Privacy
- **Phone:** 1-603-374-7880

Important information for California residents

This section describes how we collect, use and share Personal Information of California residents in operating our business, and their rights with respect to that Personal Information. For purposes of this section, “**Personal Information**” has the meaning given in the California Consumer Privacy Act of 2018 (“**CCPA**”) but does not include information exempted from the scope of the CCPA. For example, “personal Information” does not include, and this section does not cover, nonpublic personally identifiable financial information that we collect from consumers in connection with providing the Client Services. Such information is covered by our [Privacy Notice](#).

Your California privacy rights. As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
 - The categories of Personal Information that we have collected.

- The categories of sources from which we collected Personal Information.
- The business or commercial purpose for collecting and/or selling Personal Information.
- The categories of third parties with whom we share Personal Information.
- Whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information received by each category of third party recipient.
- Whether we've sold your Personal Information, and if so, the categories of Personal Information received by each category of third party recipient.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Opt-out of sales.** If we sell your Personal Information, you can opt-out.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination in the form of legally prohibited increases in the price or decreases in the quality of our Service.

How to exercise your rights

You may exercise your California privacy rights described above as follows:

- **Right to information, access and deletion.** You can request to exercise your information, access and deletion rights by:
 - Visiting: info@rampartwealthmanagement.com
 - calling us toll free at 1-603-374-7880
- **Right to opt-out of the “sale” of your Personal Information.** Like many companies, we use services that help deliver interest-based ads to you. Our use of some of these services may be classified under California law as a “sale” of your Personal Information to the

companies that provide the services because they collect information from our users (e.g., device data and online activity data) to help them serve ads more likely to interest you. You can request to opt-out out of this “sale” of your personal information here: [Do Not Sell My Personal Information](#).

We reserve the right to confirm your California residency to process your requests and will need to confirm your identity to process your requests to exercise your information, access or deletion rights. As a part of this process, identification issued by the State of California Department of Motor Vehicles will be required. Consistent with California law, you may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester’s valid State of California-issued identification, and the authorized agent’s valid government issued identification. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

Personal information that we collect, use and share

The chart below summarizes how we collect, use and share Personal Information by reference to the categories specified in the CCPA, and describes our practices during the 12 months preceding the effective date of this Privacy Policy.

Categories in the chart refer to the categories described above in the general section of this Privacy Policy.

Category of personal information (PI)	PI we collect	Source of PI	Categories of third parties to whom we “sell” PI
Identifiers	<ul style="list-style-type: none"> • Contact data • Profile data • Identity data • Data about others 	<ul style="list-style-type: none"> • You • Public services • Business partners • Our clients 	None

Category of personal information (PI)	PI we collect	Source of PI	Categories of third parties to whom we “sell” PI
Commercial Information	<ul style="list-style-type: none"> • Contact data • Profile data • Financial data • Payment & transactional data • Marketing data 	<ul style="list-style-type: none"> • You • Public services • Business partners • Our clients • Automatic collection 	None
Financial Information	<ul style="list-style-type: none"> • Financial data • Payment & transactional data 	<ul style="list-style-type: none"> • You • Public services • Business partners • Our clients 	None
Online Identifiers	<ul style="list-style-type: none"> • Contact data • Device data • Identity data 	<ul style="list-style-type: none"> • Business partners • Our clients • Automatic collection 	Advertising partners (to facilitate online advertising)
Internet or Network Information	<ul style="list-style-type: none"> • Precise geolocation data • Device data • Online activity data 	<ul style="list-style-type: none"> • You • Automatic collection 	Advertising partners (to facilitate online advertising)
Geolocation Data	<ul style="list-style-type: none"> • Precise geolocation data • Device data 	<ul style="list-style-type: none"> • You • Automatic collection 	Advertising partners (to facilitate online advertising)

Category of personal information (PI)	PI we collect	Source of PI	Categories of third parties to whom we “sell” PI
Inferences	<p>May be derived from your:</p> <ul style="list-style-type: none"> • Financial data • Payment & transactional data • Precise geolocation data • Marketing data • Device data • Online activity data 	<ul style="list-style-type: none"> • You • Business partners • Our clients • Automatic collection 	Advertising partners (to facilitate online advertising)
Protected Classification Characteristics	We do not intentionally collect this information but it may be revealed in identity data or other information we collect	<ul style="list-style-type: none"> • You • Business Partners • Our clients 	None
Professional or Employment Information	<ul style="list-style-type: none"> • Contact data 	<ul style="list-style-type: none"> • Our clients 	None

- The business/commercial purposes for which we collect and use this information are described in the section above entitled How We Use Your Personal Information; and
- The categories of third parties and other recipients to which we disclose this information for business purposes are described in the section above entitled How We Share Your Personal Information

Glossary

Statutory category	Definition (categories may overlap)
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Statutory category	Definition (categories may overlap)
Financial Information	Bank account number, debit or credit card numbers, insurance policy number, and other financial information. Does not include information collected, processed, sold, or disclosed pursuant to the federal Gramm-Leach-Bliley Act.
Geolocation Data	Precise location, e.g., derived from GPS coordinates or telemetry data.
Identifiers	The derivation of information, data, assumptions, or conclusions from any other category of Personal Information to create a profile about a person reflecting the person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.
Inferences	The derivation of information, data, assumptions, or conclusions from any other category of Personal Information to create a profile about a person reflecting the person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.
Internet or Network Information	Browsing history, search history, and information regarding a person’s interaction with an Internet website, application, or advertisement.
Online Identifiers	An online identifier or other persistent identifier that can be used to recognize a person, family or device, over time and across different services, including but not limited to, a device identifier; an Internet Protocol address; cookies, beacons, pixel tags, mobile ad identifiers, or similar technology; customer number, unique pseudonym, or user alias; telephone numbers, or other forms of persistent or probabilistic identifiers (i.e., the identification of a person or a device to a degree of certainty of more probable than not) that can be used to identify a particular person or device.
Professional or Employment Information	This term is not defined in the CCPA, but likely includes any information relating to a person’s current, past or prospective employment or professional experience (e.g., job history, performance evaluations).
Protected Classification Characteristics	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military

Statutory category

Definition (categories may overlap)

status, genetic information (including familial genetic information).