

PRIVACY POLICY

Effective 1/18/2019

Introduction

Welcome to our privacy policy! We created this to be as clear as possible about the the types of personal information that Vestive collects. It also explains why we collect your information and how we use it.

We deeply care about and respect your privacy. We will never rent or sell your information to anyone.

If you have any questions or if you believe that Vestive has not adhered to this privacy policy, please send us a note at support@getvestive.com.

Information We Collect from Visitors

We collect various types of anonymous information about visitors to Vestive, 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 Vestive site, browsing activity, and any site that referred you to Vestive).

Information We Collect from Users

When first signing up on our site, we will ask certain questions like your age, salary, investing goals, etc. that help us design a portfolio that's right for your financial situation. We will also collect your email address so we can make an account for you.

If you do not wish to provide this information, you cannot become a Vestive user.

Information We Collect from Members

If you choose to invest with Vestive, we consider you a "member". Welcome to the club!

As part of becoming a member, we will ask you for additional personal information, including but not limited to:

- Your and your beneficiaries' full legal name, contact information, birth date, Social Security Number, and citizenship.

- Your account numbers and login credentials for the bank accounts you choose to link to Vestive, any challenge and/or security questions associated with those accounts and any information contained in those accounts. Note: we may use a third-party service to aggregate your account data

If you do not wish to provide this information, you cannot become a Vestive member.

Other Ways We Collect Information

We may collect various other types of personal information if you or a friend engages with Vestive, like your email address or the website that referred you. We may also collect personal information if you communicate with our support team. Further, in order to improve our product, we may collect information regarding your browsing activity when you visit Vestive's websites, as well as actions you take within your Vestive account while logged in to your Vestive account.

Minimum Age

Vestive only accepts users or members who are at least 18 years old. If you are under 18, please do not enter any information in our site.

Cookies and Pixels

Cookies are small pieces of data that are stored on your computer, mobile phone or any other device used to access the internet. Pixels are small code blocks on a website that allow for another server to measure viewing of a webpage and often are used in connection with cookies.

We use cookies to ensure that you stay logged in during your time on the site. We may use pixels that help us monitor information like the IP address, time, and type of browser that is accessing our site.

Cookies are required for site functionality. By using the site, you accept the use of cookies.

Site Tracking

Vestive may use third-party tracking technology, such as Google Analytics, to record information about how you use the site. These technologies 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. We do not combine the information collected through the use of Google Analytics with personally identifiable information.

Advertising

We do not allow third-party advertising on our site.

How We Use Your Personal Information

Vestive 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 Vestive is used, monitor and protect the security and integrity of Vestive, and better market and advertise Vestive's services. You understand and agree that Vestive 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 own services, resources, or Vestive job openings that we think may be of interest to you. If you no longer wish to receive such marketing communications from Vestive, 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 Vestive, 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 will never sell, rent, or trade your personal information with any third parties other than with your consent or as required by law.

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 Vestive 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 You Accept This Policy

By using and continuing to use the Vestive websites, mobile apps 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 Service 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 do our best to 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 Vestive privacy policy.

Your Rights as a California Resident

California law permits users and members who are California residents to request and obtain from us once a year, free of charge, a list of the third-parties to whom we have disclosed their Personal Information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of Personal Information disclosed to those parties. Vestive does not share Personal Information with third-parties for their own marketing purposes. To exercise your rights, you may make one request each year by emailing us at support@getvestive.com.

Questions

If you have any questions on the privacy policy, please contact us at:
support@getvestive.com