

Privacy Policy

Updated: August 3rd, 2017

RobustWealth INC (doing business as “ADVRW”) is committed to the protection of your privacy. We work hard to protect your personal information to ensure your information is kept private and secure. We recognize that our relationship with users, partners and investors is based on trust, and that you expect ADVRW to act responsibly and in your best interests. Because your personal and financial data are your private information, ADVRW holds itself to the highest standards in their safekeeping and use. We will not sell or rent your information to anyone.

We use your information primarily to complete transactions that you request or to make you aware of other financial products and services that we offer.

ADVRW provides certain portfolio management & subadvisor services through RobustWealth INC, as well as access to our proprietary financial dashboard and other wealth management solutions. The purpose of this Privacy Policy is to help visitors, clients and partners understand how the ADVRW services work, what data is involved in these services and what measures we take to protect the privacy of the data with which we have been entrusted. Together with our Terms of Use, this Privacy Policy governs the use of ADVRW services.

Types and Categories of Information ADVRW Collects and Creates

ADVRW collects two basic types of information – Personally Identifiable Information (also referred to as PII or Personal Information) and Non-Personally Identifiable Information (Non-PII) – and creates other Non-PII and aggregate information from the data collected. Personally Identifiable Information is any information used or intended to be used to identify a particular individual, including, but not limited to, name, address, telephone number, email address, and government-issued identifier, including Social Security numbers, passport numbers, tax ID numbers and driver's license numbers; Personal Financial Information, including bank, credit and debit account numbers and access codes, bank account and credit card information, credit reports and ratings and other non-public personal financial information as defined under applicable laws, including the Gramm-Leach-Bliley Act and the Fair Credit Reporting Act.

How ADVRW Collects Information

ADVRW collects information in three different ways: when customers voluntarily provide information, through automated means such as cookies, and directly from other third parties.

Volunteered as a Customer

When you choose to create an account with ADVRW, we will collect certain Personal Information including but not limited to your name, address, telephone number, email address, financial account number, and other government-issued identifiers.

As a Visitor

ADVRW may collect certain Non-Personally Identifiable Information through certain technology, including cookies, web beacons, and pixel tags when you visit the online properties of ADVRW. We use these technologies to collect information that helps us understand how our site and other web based

Privacy Policy

properties are used. A more detailed description of these technologies is set forth in the “Use of Cookies & Pixels” section below.

Third Parties.

In addition to Personal Information you provide to us, we may receive information about you that you authorize third parties to provide to us. We also may obtain Personal Information from third party service providers in order to verify your identity, to prevent fraud, or to help us identify products and services that may be of interest to you. Personal Information collected from any source may include, among other things, your name and address, Social Security or taxpayer identification number, date of birth, assets, income, account balances, investment activity, and accounts at other institutions.

Sharing Information

We may share your personal information or the personal information of your clients with third parties, including companies that perform services for us or on your behalf, companies that participate in joint marketing activities and other organizations with your consent or as directed by you or your client.

Further, we may share your personal information with companies with whom we are participating in conjunction with proposed or actual sale, merger, transfer, business exchange or other transformative commercial event.

We take the security of your personal information very seriously. We have entered into agreements that require that these third parties keep this information confidential and to treat your personal information with the same degree of care as they would treat their own confidential information.

As required by law, we will also provide your information with regulatory or government entities including but not limited to the Internal Revenue Service and the Securities and Exchange Commission. In addition, we may share your personal information in response to a valid judicial or other government request for information, subpoena, warrant, order or as may otherwise be required by law to appropriately investigate, prevent, or take action regarding illegal activities or suspected fraud.

Use of Cookies & Pixels

Our website uses a variety of technologies to collect information that helps us understand how our site is used. A cookie is a small file of letters and numbers that is stored on the hard drive of your computer. Cookies may expire at the end of a web session or persist in order to store your settings and preferences. A web beacon, also known as a pixel tag, is a tiny transparent image embedded in a webpage or an email to measure usage and activity. In some cases, a web beacon triggers the placement of a persistent cookie on your computer.

ADVRW offers customized features that require use of cookies and web beacons. Certain sections of our site require cookies to be enabled to support website performance and provide enhanced authentication. For example, cookies enable us to personalize and improve your user experience and help enhance site navigation. Cookies also help us to understand how people use our site so that we can improve site structure, functionality and content. Web beacons allow us, directly or through our third party service providers, to collect information used for website analytics, such as how many users have visited particular pages or downloaded documents on our website, or how frequently users search for a particular term on our website. However, our use of these cookies and web beacons is limited. We will

Privacy Policy

not share the information in these data files or give others access to it—except to help us better serve your investment needs and as described in this Privacy Policy.

If you delete or reject cookies, you may be unable to register for or log on to our website, some pages of the site might not function properly, and the site experience will not be tailored to you from visit to visit.

Your Access to and Control

Keeping your account information accurate and up to date is very important. ADVRW provides you the ability to exercise certain controls and choices regarding ADVRW's collection, use, and sharing of your information. In accordance with applicable laws, you may exercise control over information collected including:

Contact Information. If your contact and/or account information is incomplete, inaccurate or not current, please use the Contact Us option on our website. You can also speak to a customer representative, your Financial Advisor or account representative. You may change your choices for newsletters by using the choice mechanism within each email or marketing communication from ADVRW or an ADVRW partner.

Personally Identifiable Information. In accordance with applicable laws, you may request access to the Personally Identifiable Information ADVRW processes, the purposes for such processing, and the categories of recipients to whom the data is disclosed, that ADVRW amend or delete it, and that ADVRW request third parties with whom ADVRW has shared the information do the same. To make such a request, please send an email to service@robustwealth.com Attention: Data Privacy/Personally identifiable information. Please note, we will not delete information that we are required to retain in order to comply with applicable laws and regulations.

Security

Wherever we collect sensitive information (such as credit card data), that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a closed lock icon at the bottom of your web browser, or looking for "https" at the beginning of the address of the web page.

In addition to using encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, customer service) are granted access to Personal Information. The computers/servers in which we store Personally Identifiable Information are kept in a secure environment. To protect your Personal Information, we maintain physical, electronic, and procedural safeguards in keeping with industry standards and practices, and we review and adjust these safeguards regularly in response to advances in technology.

Children's Privacy

Our service is not directed towards anyone under the age of 13. ADVRW does not intentionally collect, license, or use Personal Information as defined by the COPPA Rule from children under the age of 13. If a parent or guardian becomes aware that his or her child under the age of 18 has created an account with ADVRW and/or provided us with personally identifiable information, please contact us at service@robustwealth.com with "COPPA" in the subject line. Alternatively, communications can be mailed to: RobustWealth, 204 N. Union St., Lambertville, NJ 08530, Attention: Data Privacy/COPPA.

Privacy Policy

Updates

Our Privacy Policy may change from time to time. The “last updated” date at the top of the privacy policy is the date of the most recent version. Please review ADVRW’s Privacy Policy periodically to remain informed about how ADVRW collects and uses data. If ADVRW makes any changes to this Privacy Policy, such changes will be posted here. Your continued use of our website and services after such changes shall be deemed to be your consent to such changes.