

## DataDriven Advisor, LLC Privacy Policy



Policy Effective Date: August 6, 2019

### **Privacy Policy**

DataDriven Advisor (DDA) recognizes that as your investment advisor you entrust us with both your hard-earned assets and your personal and financial information. We consider this information to be private and confidential. Ensuring your privacy is our utmost concern. This document describes how we treat personal information when you use DDA's products and services.

### **Information We Collect**

DDA uses your personal information to provide you with the superior service you expect from us. DDA may collect public and nonpublic personal information about you from any of the following sources:

Information from forms you provide to us in connection with your accounts (such as your name, address, birth date, social security number, assets, and income);

Information about the accounts that MCM manages or monitors on your behalf (such as trading history and account balances);

Information obtained through discussions with you about your accounts or inquiries made by you regarding your accounts (such as portfolio risk profiles, income needs, and account set-up preferences);

Information obtained from other sources with your consent (for example, from other institutions if you are transferring assets to be managed by MCM).

DDA restricts access to non-public personal information about Users to certain DDA employees who require that information in order to provide our services. DDA may ask you for additional personal information, such as your name or picture, in order to provide personalized services to you. DDA stores, processes, and maintains data related to you in order to provide our services.

Along with cookies, DDA may also use third-party tracking technology, such as Google Analytics, to record similar information regarding you and your activity on the Site.

DDA is not directed to anyone under the age of 18. If a parent or guardian becomes aware that his or her child under the age of 18 has provided us with personally identifiable information without his or her consent, he or she should contact us at [support@Datadrivenadvisor.com](mailto:support@Datadrivenadvisor.com). If we become aware that a child under the age of 18 has provided us with personally identifiable information, we will delete such information from our files.

### **Use of Information**

DDA has always considered the protection of sensitive information to be a foundation of customer trust and an important business practice. We do not sell your personal information to anyone. We do not disclose

or share nonpublic personal information about you to third parties, unless one of the following limited exceptions applies or you have specifically asked us to do so:

We disclose personal information to custodial companies and technology companies that help us process or service your transactions or account(s) (such as Schwab Institutional). We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law, for example, to cooperate with regulators or law enforcement authorities.

DDA restricts access to your personal and account information to those employees who need to know that information in order to provide services to you. We maintain physical, electronic, and procedural safeguards to guard your nonpublic personal information.

If you are a Client, DDA may also process information for performing trades for your account, investing activity in your account and/or calculating your portfolio performance.

DDA may send you information related to DDA services or your account if you are a Client. If you decide at any time that you no longer wish to receive marketing communications from us, please inform us of your desire to “unsubscribe”.

### **Information Sharing and Onward Transfer**

We do not sell, rent, or otherwise share your personal information with any third parties except as permitted or required by law. We disclose personal information to custodial companies and technology companies that help us process or service your transactions or account(s).

DDA maintains physical, electronic and procedural safeguards that comply with federal standards to guard Users’ non-public personal information.

### **Special Rules for the Use and Sharing of Information of Clients**

If you wish to become a Client, we will ask you for certain information, including, but not limited to, your full legal name, contact information, birth date, SSN, citizenship, investment objectives, approximate net worth, and other regulatory disclosures that may be necessary. We require such information in order to be able to provide our services to Clients in accordance with the rules of regulatory bodies such as the Securities and Exchange Commission and FINRA. You may choose not to provide such information to us, but you will not be able to become a Client.

We may share the information required to become a Client with our brokerage partner solely for the purpose of allowing our brokerage partner to provide services to you.

### **Your Choices**

You may request deletion of personal information by emailing [support@datadrivenadvisor.com](mailto:support@datadrivenadvisor.com) and providing us enough information to identify your account and prove that you are the owner of the identified account. We will endeavor to act on these deletion requests as soon as reasonably practicable. Deletions take effect when we act on them. Residual information related to your account may remain for some time on our servers. If you are a Client you may request that we remove your personal information, and we will do so as soon as reasonably practicable. However, we may retain such information, as well as any data

related to your trades, in accordance with applicable laws. In no case will we share any individual trading data unless required by regulators or other government bodies.

You may decline to provide personal information to DDA. Declining to provide personal information may disqualify you for DDA services and Site features that require certain personal information.

### **Online analytics**

We may use third-party web analytics services on our Services, such as those of Google Analytics. These service providers use the sort of technology described in above to help us analyze how users use the Services, including by noting the third-party website from which you arrive. The information (including your IP address) collected by the technology will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of the Services. We also use Google Analytics for certain purposes related to advertising, as described in the following section.

### **Phishing Scams**

DDA does not send emails to customers requesting billing, login or password information. If you receive an email purporting to be from DDA that asks you to provide personal or account information, or login and passwords, do not provide such information unless you have first verified that the website or email is from DDA. Such emails may be fraudulent and used in connection with scams known as phishing. DDA asks that you report any suspicious emails or websites to DDA.

### **Changes to this Policy**

This Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any Privacy Policy changes on this page and, if the changes are substantial, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

### **More Information**

This document constitutes DDA's complete Privacy Policy for DDA and the Site.

If you have questions or comments about this Privacy Policy, please email us at [support@datadrivenadvisor.com](mailto:support@datadrivenadvisor.com).

You can also contact DDA by phone at 917-768-3390.