



## **QuantRiver Financial, LLC.**

### **Privacy Policy**

Effective December 10, 2010

The privacy and security of your personal and account information is of the utmost importance to QuantRiver Financial, LLC. ("QuantRiver Financial") as it is to you. QuantRiver Financial adheres to confidentiality standards that are designed to protect your personal information in accordance with the guidelines established in US Law and Securities and Exchange Commission Regulations. QuantRiver Financial shall exercise reasonable precautions to maintain the confidentiality of all information provided in connection with accessing this site. Because such information can be accessed through the Internet, absolute assurances cannot be given.

#### **Customer Privacy Policy**

Our Customer Privacy Policy covers information you provide when applying for or obtaining investment products and services. QuantRiver Financial is committed to safeguarding the personal information that you provide us. This notice describes our privacy policy and how we handle and protect personal information we collect about individuals and entities who apply for or obtain our products and services. The provisions of this notice apply to both former customers and current customers.

#### **The Collection of Non-Public Personal Information**

As a QuantRiver Financial Customer, you will have a personally selected login ID (username) and password that will provide you access to the Website. In establishing your Account, you must provide us personal information, including your name, address, e-mail address, telephone number, birth date, social security number/tax identification number, employment information, financial and affiliation information.

QuantRiver Financial offers the following account types: Individual, Joint, and Custodial, IRA, Trust, Corporate, Limited Liability and Investment Club/Partnership. For a Joint account, personal information for all account holders will be collected from the Primary Account Holder. For a Custodial account, personal information for the both the minor and the custodian will be collected from the Custodial Account Holder. For IRA accounts personal information will be collected for both the account holder and beneficiary from the account holder. For Trust Accounts personal information will be collected for the Trustee(s) from the Trustee opening the account. For Corporate accounts personal information will be collected for Corporate Officers from the primary Corporate Representative. For Limited Liability accounts personal information will be collected from the member opening the account for all members of the limited liability company. For Investment Clubs and Partnerships personal information will be collected for all partners from the authorized party.

We also collect information based on transactions that you place with us.

Further, as is true of most websites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, referring/exit pages, operating system, date/time stamp, and click stream data.

We use this information, which does not identify individual users, to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole. We do not link this automatically-collected data to personally identifiable information.

### **Why and How We Collect Personal Information**

We collect personal information about you for business purposes, such as verifying your identity as required by law, processing your requests and transactions, informing you about products and services that may be of interest to you, and providing customer service. The personal information we collect about you includes:

- Information you provide to us on applications and other forms (such as your name, address, social security number, date of birth occupation, employment information, assets, income, investment experience, and risk tolerance);
- Information about your transactions with us, such as your account balance, trading activity, and payment history, our affiliates and others; and/or
- Information we receive from consumer reporting agencies (such as your credit history) and other entities not affiliated with QuantRiver Financial.

### **How We Protect Personal Information**

QuantRiver Financial takes extensive precaution to protect our users' information. We limit access to your personal information to those employees who need to know in order to conduct our business, service your account, and help you accomplish your investment objectives, such as providing you with a broad range of products and services. Our employees are required to maintain and protect the confidentiality of your personal information and must follow established procedures to do so. To comply with applicable laws and regulations, we maintain physical, electronic, and procedural safeguards to protect your personal information.

When users submit sensitive information via the website, your information is protected both online and off-line. We have security measures in place to protect against the loss, misuse, and alteration of any information we receive from you. However, be aware that as with any transmission over the Internet, there is always some element of risk involved in sending personal information.

When you are logged on to the QuantRiver Financial site, all transmissions of data between yourself and the QuantRiver Financial server take place using SSL (Secure Socket Layer) protocol. This means that the data is encrypted for protection. To confirm that SSL secure protocol is being used, you can observe the lock icon on the bottom of Web browsers such as Microsoft Internet Explorer, Mozilla Firefox and Netscape Navigator. The lock icon will display as "locked", as opposed to "un-locked", or open when secure communications are being used.

QuantRiver Financial also provides strong back-end protection of customer information. Firewalls provide a filter to block unauthorized requestors. Finally, the servers on which we store personally identifiable information are kept in a secure environment, behind a locked cage.

### **Sharing Information With Our Affiliates**

We may share personal information described above with our affiliates for business purposes, such as servicing Customer accounts, as permitted by applicable law. Our affiliates are companies controlled or

owned by us, or companies controlling or under common control with our parent company and us, and may include financial service companies and companies not involved in financial services.

### **Disclosure To Nonaffiliated Third Parties**

We may share the personal information described above for business purposes with the following companies not affiliated with us:

- Financial service institutions (such as mutual fund companies, securities brokers, clearing brokers and banks) with whom we have joint marketing agreements (such as agreements to market financial services or products that we jointly offer, endorse or sponsor); or
- Companies under contract to perform services for us or on our behalf (such as vendors providing data processing, computer software maintenance and development, transaction processing and marketing services).

We will share personal information with non-affiliated companies only when they agree to uphold and maintain our privacy standards when handling a Customer's personal information. Also, we may disclose personal information with non-affiliated companies and regulatory authorities as permitted by applicable law. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies and as necessary to protect our rights or property. Except as described in this privacy policy, we will not use your personal information for any other purpose unless we describe how such information will be used at the time you disclose it to us or we obtain your permission to do so.

We do not sell your personal information to third-party marketers or any other entity for any purpose.

### **Opt-Out of Further Notifications**

From time-to-time, we notify customers of announcements, new products and services, and/or upgrades and updates. If you would like to opt-out of these notifications, please [contact us](#) as indicated at the end of this Privacy Policy.

Customers can choose at any time to opt-out of any marketing program implemented through QuantRiver Financial, its affiliates, or a nonaffiliated third party, by [contacting us](#) as indicated at the end of this privacy statement.

Please be aware that we reserve the right to notify customers of any information that affects their account, the security of our products or services, and/or any changes to our procedures.

### **Accessing and Revising Your Personal Information**

We endeavor to keep our Customer files complete and accurate. We will give you reasonable access to the information we have about you. Most of this information is contained in account statements that you receive and applications that you submit to obtain our products and services. We encourage you to review this information and notify us if you believe any information should be corrected or updated. If you have a question or concern about your personal information or this privacy notice, please contact QuantRiver Financial Customer Support at [support@qrfn.com](mailto:support@qrfn.com), or visit our website at [www.QuantRiverFinancial.com](http://www.QuantRiverFinancial.com).

## **The Disclosure of Non-Public Personal Information** (For Regulatory Purposes)

QuantRiver Financial is required to comply with reporting requirements of certain regulatory agencies, such as the U.S. Securities Exchange Commission (SEC), Internal Revenue Service (IRS), Federal Bureau of Investigation (FBI), and to parties under court order or subpoena that request this information. Disclosures for which you have provided your consent or you have directed us to make are also permitted. To comply with these requirements, QuantRiver Financial must retain certain information about customers, even if a Customer requests such information to be removed from QuantRiver Financial database or has closed his or her account with QuantRiver Financial. QuantRiver Financial also retains copies of all e-mail communications for archival purposes, including your e-mail address and our response to any of your questions or comments.

Under certain circumstances, we may be required or permitted by law to disclose your personal information. QuantRiver Financial may also disclose personal information when necessary to protect our legal rights or to enforce our Terms of Use.

### **Your Responsibilities**

- **Passwords** - Your Login ID (username) and Unique Password is your secure key into your account. You are responsible for maintaining the confidentiality of your ID and password. You should never share your password with anyone, and you should change it frequently. Sharing your ID and password with others will allow them complete access to your account and related personal information.

You can change your password, as well as other personal information you provide to QuantRiver Financial when you set up an account online any time by accessing your Account Profile through the menu of 'Manage Account'. You should be sure to provide QuantRiver Financial with any updates and changes to your personal information, including your e-mail address.

- **Messages (Electronic) From QuantRiver Financial, LLC.** - QuantRiver Financial has a state-of-the-art ability to communicate with you in near real-time through the use of personalized messages that you will see upon Login and by use of email. It is your responsibility to respond promptly to those messages. QuantRiver Financial also has the ability to provide you with general communications such as information about services and products that we believe may be of interest to you.
- **Privacy Policy Updates** - Annually, QuantRiver Financial will send you via e-mail a copy of our latest privacy policy. Additionally, from time to time QuantRiver Financial may modify its Privacy Policy. We will always attempt to notify our customers of changes to the Privacy Policy; however, it is your responsibility to monitor the site for changes. In the event of a material change, a prominent notice will be posted at [www.QuantRiverFinancial.com](http://www.QuantRiverFinancial.com), and the revised policy will be available to you through this notice on our website, and the revised policy will be posted on our Website, with the last date of update noted on the top of the page. Remember to check the site periodically to remain informed of any changes to QuantRiver Financial's privacy policies and practices.

- **Regarding The Use Of Cookies** - We use cookies to assist and enhance communication and overall performance of our website. (Cookies are data or parcels of text sent from the web server to your web browser.) The cookies this site creates do not contain any personal information nor do they contain account or PIN information. They allow the site to recognize that a page request comes from someone who has already logged on. While your browser may allow you to "reject" cookies, our website requires that you accept all cookies in order for the website features and mechanisms to function fully.

Third parties may also place cookies when you access their sites through linking from this site. We do not have access to these cookies or any information that these cookies may contain. Please contact the third party site for more information on these cookies. Although we encourage third parties to adhere to appropriate privacy policies and standards, we are not responsible for the actions or policies of such parties.

- **Regarding The Use Of Links** - The QuantRiver Financial website has many outstanding features from highly reliable sources that allow you to gain access to data prepared and maintained in other websites. QuantRiver Financial takes great care to select highly reputable sources to link with. However, we have no control over the content, policies or actions of these sites, even if you are offered services on those sites because you have established a QuantRiver Financial account. The protection of personal information on other websites is not governed by QuantRiver Financial privacy policy, so you should carefully review the privacy policies of third party websites and contact the operators of those Websites if you have any questions about their use of your personal information. QuantRiver Financial cannot be responsible for these parties failing to use your personal information in accordance with their contractual or other legal obligations.

If you have questions or concerns regarding this statement, you should contact Customer Support by email at [support@qrfin.com](mailto:support@qrfin.com) or call (239) 244-8787.