

FACTS**WHAT DOES PASSFOLIO DO WITH YOUR PERSONAL INFORMATION?**

Rev. 09/12/2019

Why?

Financial companies choose how they share your personal information. U.S. Federal law gives consumers the right to limit some but not all sharing. U.S. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and government-issued ID number, or equivalent in other countries if you are a foreign individual
- Information you provide on applications and other forms or in correspondence with us (e.g., name, physical address, email address, income, other household information)
- Data regarding transactions made with us (e.g., account status and balances, transaction history, products/services purchased)

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Passfolio chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Passfolio share?	Can you limit this sharing?
For our everyday business purposes-- such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, report to credit bureaus, or as permitted by law	Yes	No
For our marketing purposes-- to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	No
For our affiliates' everyday business purposes-- information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes-- information about your creditworthiness	Yes	Yes
For our affiliates' to market to you	Yes	Yes
For non-affiliates to market to you	No	We don't share.

To limit our sharing

- To opt out, please email us at support@passfolio.com.

Please note:

If you are a *new customer*, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer our customer*, we continue to share your information as described in this notice. However, you may contact us at any time to limit our sharing.

Questions?

- Email us at support@passfolio.com.

Who we are	
Who is providing this notice?	Entities in the Passfolio family of companies, including Panchain, Inc., Passfolio Financial, LLC, Passfolio Securities, LLC, and Passfolio Advisers, LLC.
What we do	
How does Passfolio protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with U.S. Federal law. These measures include computer safeguards and secured files and buildings. We also maintain other physical, electronic, and procedural safeguards to protect this information and we limit access to information to those employees for whom access is appropriate.
How does Passfolio collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> - Register yourself in the Passfolio electronic portal - Fill out applications or other forms, or correspond with us - Provide account information - Direct us to sell securities - Direct us to buy securities We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	U.S. Federal law gives you the right to limit only <ul style="list-style-type: none"> - sharing for affiliates' everyday business purposes--information about your creditworthiness - affiliates from using your information to market to you - sharing for non-affiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> - Panchain, Inc. - Passfolio Financial, LLC - Passfolio Securities, LLC

Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. - Non-affiliates we share with can include accountants, administrators, attorneys, auditors, brokers, government entities, and marketing providers.
Joint marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you. Passfolio 's joint marketing partners can include banks and other financial services providers.

Changes to this Privacy Policy

This notice may be changed at any time, provided a notice of such change is given to you. Where such changes are made, we will update the "Rev." date at the top of this notice as needed and notify you by posting the revised notice on our website and mobile application and/or sending you the revised notice (or a link to the revised notice) via e-mail. Any changes to this notice become effective upon notification in a manner described above, subject to providing you with a reasonable opportunity to opt out of any disclosures as required by U.S. federal law.

Acceptance and consent

By clicking below or the use of Passfolio's services, you acknowledge and agree to the provisions of this notice and to receive notices in electronic format (such as through our website, mobile application, and/or email).

Other important information

California Residents. We will not share information we collect about you with non-affiliated third parties, except as permitted by law, such as to process your transactions or to maintain your account. We also send California residents a California notice for additional choices. **Vermont Residents.** We will not share information we collect about you with non-affiliated third parties, except as permitted by law, such as to process your transactions or maintain your account. We may share your information with our affiliates, so they may market to you. However, we will not share information about your credit worthiness with affiliates. Additional information concerning Passfolio's privacy policies can be found at www.passfolio.com/disclosures.

Nevada Residents. Nevada law allows us to make marketing calls to our existing customers listed on the National Do Not Call Registry. If you prefer not to receive marketing calls from us, you may be placed on our internal Do Not Call list by emailing us at support@passfolio.com. For more information, please contact us at support@passfolio.com. You may also contact the Nevada Attorney General's office: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Street, Suite 3900, Las Vegas, NV 89101; phone: 702.486.3132; email: aginfo@ag.nv.gov.

North Dakota Residents. We will not share information we collect about you with non-affiliated third parties, except as permitted by law, such as to process your transactions or to maintain your account.