

Privacy Notice

FACTS	What Does ChangePath Do with Your Personal Information?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. 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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> Social Security Number and investment experience Income and risk tolerance Assets and account transactions <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
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 ChangePath chooses to share; and whether you can limit this sharing.

REASONS WE CAN SHARE YOUR INFORMATION	Does ChangePath 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, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don't share
For affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

QUESTIONS?	CALL (888) 798-2360 or go to www.changepath.com/privacy-policy/
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WHAT WE DO

How does ChangePath protect my information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and building.
How does ChangePath collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> • Open an account or give us your contact information • Seek advice about your investments or tell us about your investment or retirement portfolio • Enter into an investment advisory contract. <p>We also collect your personal information from others, such as credit bureaus, affiliates or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <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 nonaffiliates to market to you. <p>State laws and individual companies may give you additional rights to limit sharing. See the Other Important Information section for your rights under state law.</p>

DEFINITIONS

Affiliates	<p>Companies under common ownership or control. They can be financial and non-financial.</p> <ul style="list-style-type: none"> • <i>Our affiliates include Creative One, LLC and Client One Securities, LLC.</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial.</p> <ul style="list-style-type: none"> • <i>ChangePath does not share with nonaffiliates so they can market to you.</i>
Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • <i>ChangePath does not jointly market.</i>

OTHER IMPORTANT INFORMATION

California Residents	We will not share information we collect about you with companies outside of ChangePath, unless permitted by law. For example, we may share your information to service your accounts. We will limit sharing among ChangePath and its affiliates to the extent required by California law.
Nevada Residents	Nevada law requires us to disclose that you may request to be placed on our internal "Do Not Call" list at any time by calling (888) 798-2360, and that you may obtain further information by contacting the Nevada Attorney General, 555 E. Washington Ave., Ste. 390 Las Vegas, NV 89101; phone 702-486-3132; email BCPINFO@ag.state.nv.us. Please note that ChangePath's "Do Not Call" list is limited only to telephone solicitation calls. We may still contact you about your ChangePath account(s), billing issues, and other matters that relate to the administration of your account(s).
Vermont Residents	As a resident of Vermont, we will automatically limit sharing of your information outside of the ChangePath corporate family, unless otherwise permitted by law. We may share information with your consent or to service your accounts.