

# Motif Investing Privacy Policy

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## Motif Terms of Use

Motif Investing respects the confidentiality of our customers' non-public, personal information. It is our intention to ensure that this information is safeguarded to protect against its misuse. To that end, we are making available to you our Privacy Policy to remind you of our concern for and our efforts related to the protection of your personal non-public information.

## Motif Investing As Introducing Broker

Motif Investing, acting as an introducing broker to its clearing broker Pershing LLC, carries the responsibilities for custody of your assets and transacting on your behalf. Information about Pershing's role is available in our Customer Agreement. In addition, Pershing makes available its own Privacy Statement on the Motif Investing website, which you should review.

## Personal Information

Personal information is information that we can use to identify you as an individual. This information can include your name, address, telephone number, Social Security number, date of birth and other information that is connected with your identity. We collect personal information in part to meet compliance with regulatory requirements, such as the specific information we gather about you on our account application and other forms. With a customer's consent, we may contact other vendors such as credit bureaus to verify the customer's identity. Motif Investing may also be required to protect our own legal rights in certain situations where we are trying to enforce a customer's obligations to maintain a brokerage account in good order with us. In those cases, we are required to share limited information about you or your account, but require that the vendor maintain the information as confidential and not to repurpose the information for their own use in any way.

We are required to provide your personal information to agencies such as the IRS, securities regulatory agencies, and other regulatory government entities, and in certain cases, as required by law in response to judicial orders. Regulatory rules require broker-dealers like Motif Investing to retain personal information and records of account activity for defined periods of time that extend beyond the time you no longer maintain an active account with us.

In addition, we can collect other personal information to help enable us to identify needs our customers have and provide products and services designed to meet those needs. Motif Investing can use personal information collected from you for purposes such as:

- responding to requests for specific products and services;
- efforts to improve the design and content of the website or other features made available by the firm;
- contacting you about new offers or enhancements to products and services.

We may share your information with third parties who help us in the delivery of our own products and services to you. We disclose information to companies and individuals we employ to perform functions on our behalf. Examples include hosting our Web servers, analyzing data, providing marketing assistance, and providing customer service. These companies and individuals will have access to your personal information as necessary to perform their functions, but they may not share that information with any other third party.

Aggregate information is information that we collect in general about Motif Investing web site users on an anonymous basis. We may share aggregate demographic and usage information with business partners, advertisers and other third parties to enhance our ability to make improvements to our products and services or for other academic purposes.

## **Cookies**

Motif Investing automatically collects IP addresses and web site usage information from you when you visit the [motifinvesting.com](http://motifinvesting.com) web site. This information helps us evaluate how our users navigate and use our web site and, as a security precaution, help identify accounts at specific internet service providers. We collect access times and periods of usage for customer services and operational purposes and to help identify if issues persist that require enhancement to system performance.

“Cookies” are small amounts of data files that a website can send to your web browser and store on your computer. If the browser agrees to store them, the browser will send them back to the web server each time a request is sent to the web server. Cookies can be regularly deleted or disabled. Doing so may affect the interaction with the web server, and you may be required to login or be blocked from being able to use the web site. Cookies do not contain personal information unless you knowingly provide it. Keep in mind that cookies can identify certain sites or pages that your browser visited at particular times and dates. However, Motif Investing does not store personal information in any cookie sent to your browser. You can set many browsers to notify you when a cookie is being placed on your computer and also erase cookies that may have been knowingly or unknowingly set on your computer.

We use cookies on the website and we link the information we store in cookies to the personal information you submit while on our site to:

- help our visitors navigate the website
- facilitate the registration and login process for our services
- personalize your experience
- analyze our visitors' visits and usage of product features
- measure advertising and promotional effectiveness

### **Third Party Cookies**

The use of cookies by our marketing affiliates and tracking utility service providers is not covered by our privacy statement. Our affiliates and service providers use session ID cookies to make it easier for you to navigate our site. They do not have access to the personal information you have provided to us.

### **Clear Gifs (Web Beacons/Web Bugs)**

Our third party web analytics partners employ a software technology called clear gifs (a.k.a. Web Beacons/Web Bugs), that help us better manage content on our site by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. We do not tie the information gathered by clear gifs to our customers' personal information. We use clear gifs in our HTML-based emails to let us know which emails have been opened by recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. If you would like to opt-out of these emails, please see "Service Messages" section below.

### **Service Messages**

Motif Investing requires users to provide contact information such as name and email address, which we use to contact the customer when necessary about products and services available through Motif Investing. For non-essential communications, customers may elect to opt-out of receiving those mailings. However, we are required to continue to email information about your account to you to the email address you have provided.

### **Links**

Motif Investing makes available links to other unrelated third-party sites as a convenience to allow you to easily access information that may be helpful or enhance your ability to manage your brokerage account. Keep in mind, those sites that you link to are sites of unaffiliated companies, which are governed by their separate privacy policy. This privacy policy applies only for the use of the Motif Investing website.

### **Account Information Security**

Motif Investing places your account information in a protected and secure portion of our website, and employ firewalls and security technology to protect our network and systems from external attacks. Motif Investing requires customers to enter a unique user name and password to access your account information online. Motif Investing utilizes SSL (Secure Socket Layer) technology to protect the security of the information, such as transactions, transmitted between your computer and our servers. You can always verify the identity of our web site because we use web server certificates that are signed by a trusted third party.

Motif Investing restricts access to information about our customers to personnel who need to know that information in order to service customers. Motif Investing provides training to its staff, maintains procedures to monitor associate activities regarding access to customer information, and conduct examinations of our business practices in order to protect your personal information.

You can take steps as well to protect the security of your account information. Take care in selecting an appropriate password and change it regularly. Do not share your account and password information with anyone. While outside the privacy of an environment that you control, do not walk away from your computer while logged into your account. Use caution if using a public computer to access your account unless you can verify that it's not capturing key strokes and that you can erase all of your information when you exit your account.

### **Use of Email**

Motif Investing utilizes email as a primary source for communicating with you to notify you of information that is available that directly affects your account, such as the availability of trade confirmations and account statements, notification of corporate actions, transmitting certain account activity, and identifying account restrictions that can require immediate attention. We also use email as a tool to notify customers of enhancements to products and services and new offers. It is your responsibility to ensure that you maintain a current email address with Motif Investing, attend to it regularly, and notify us if there are any changes to be made to your email address.

### **Changes to Personal Information**

Many changes can be made to your personal information by logging into your account and visiting the Account Settings page. For security purposes, we do not allow customers to make changes online for certain requests, such as changes in name and social security number. For those cases, and for any questions you may have, you can contact our Customer Service Representatives to assist you further.

### **Applicability of Motif Investing Privacy Policy**

The Motif Investing Privacy Policy applies to the activities of Motif Investing, Inc., and its wholly-owned subsidiary, Motif Capital Management, Inc. Motif Investing's primary audience include self-directed retail investors. A segment of Motif Investing's clients have an agreement in full force and effect with a third-party investment advisor, to have their accounts managed

through the Motif Advisor Services platform. Motif Capital Management, is an investment advisor, whose primary audience is institutional investors. This Privacy Policy will appear on the following websites, [www.motifinvesting.com](http://www.motifinvesting.com), [www.motifadvisor.com](http://www.motifadvisor.com), and [www.motifcapital.com](http://www.motifcapital.com), and applicable mobile channels.

### **Changes to Privacy Policy**

Motif Investing may change this policy from time to time without notice. Any changes to this policy will be promptly posted on the web site so we encourage you to refer back to this policy regularly. Your use of Motif Investing's web site after any changes have been posted will constitute your agreement to the modified Privacy Policy.