

## Online Privacy Policy

*Last Updated November 1, 2018*

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### **Our commitment to privacy**

We believe that the privacy and security of your personal information is essential. This policy summarizes how we use, share and protect the personal information we may collect about you.

This privacy policy covers the following affiliated companies in the Edelman Financial Engines family of companies: Financial Engines Advisors L.L.C., a registered investment advisor, Edelman Financial Engines, LLC and Edelman Financial Services, LLC. These entities are collectively referred to as “affiliated companies,” “we,” “us” and “our” throughout this privacy policy. This privacy policy applies to individuals who are current, former and prospective customers. Our websites link to other websites, and we are not responsible for the privacy practices or content of those other websites.

Please read this policy carefully as your interaction with our websites, mobile application and emails will signify your consent to these practices.

### **What personal information is collected?**

The types of personal information that we and our third-party service providers collect depend on your interactions with us, the services available to you and the services you have with us. This information may include:

- Information that you provide, such as your name, age, salary, investment holdings and preferences, contact information and your credit card and billing information;
- Information about your use of our services and your communications to us about our services;
- Information about your transactions with third parties, such as changes to investment holdings and contribution rates;
- Information from third parties (*e.g.*, your retirement plan sponsor or administrator or other financial

institution that makes our service available to you), such as your financial account information including financial institution, account balances and contributions, name, age, salary, contact information and investment holdings; and

- Information you provide when you request literature or information about our services.

In addition, when you visit our websites, use our mobile application or read our emails, we and our third-party service providers may collect certain information by automated means. This information is often collected and stored using “cookies” and similar technologies. For more information, please see the section below entitled “*Cookies and similar technologies.*” Data that tracks visits to our websites, use of our mobile application and interaction with our emails is typically collected by a contracted third-party service provider acting on our behalf. For more information, please see the section below entitled “*Interest-based advertising and third-party analytics.*”

### **Will you be required to provide personal information to access our websites or mobile application?**

General information about us and our products and services can be accessed without providing personal information such as your name, email address or account information. However, our secure websites and mobile application may require personal information, such as a name, zip code, date of birth or last four digits of a Social Security Number to assure only authorized persons access our services.

### **How is your personal information used?**

Your information is used by us to provide you with services, to inform you of our new features or services you may be interested in, and to fulfill our legal and regulatory requirements. By having more information about you, we are better able to customize our services to your particular situation.

Data that does not include personally identifiable information may be used to help improve our services, including for academic research or other research purposes. For instance, we may compile data, excluding personally identifiable information, for purposes of demographic analysis and research.

Also, if you choose to participate in voluntary surveys, webinars or user research which you may receive from time to time, any information you provide will be handled in the manner specified in connection with such survey, webinar or research.

### **How is your personal information protected?**

We follow specific policies and procedures to maintain the confidentiality of your personal information. We maintain physical, electronic and procedural safeguards to protect your information. We also restrict access to your personal information to those of our employees with a business need to know such information. For more information, please view our Security Statement available on our homepage.

### **How is your personal information shared with unaffiliated third parties?**

We do not share your personal information with unaffiliated third parties for use in marketing their products or services, and we do not sell information of current, former or prospective customers to anyone. We may share your personal information with unaffiliated third parties in the following limited circumstances:

- We have your permission to share the information; or
- With companies who work on our behalf to provide our products or services to you, or to maintain or service your account (for example, with a financial institution to execute transactions; with a mailing service company to send communications to you; or in connection with marketing of our products); or

- We are required or authorized by law to disclose your information (for example, to comply with a subpoena or regulatory requirement, or to protect against fraud or illegal activity).

We require that our service providers agree to keep your personal information confidential and use it only for the specific purpose for which we provide it to them.

### **How is your personal information shared with our affiliated companies?**

We may share personal information about you with our affiliated companies for everyday business purposes, however, our affiliated companies are not permitted to use this information to market their products or services to you. Additionally, we do not share information with our affiliated companies regarding your creditworthiness.

Please see our [Privacy Policy](#) more information on how your information may be shared.

### **Privacy Online**

When you interact with us by using our websites and mobile application or reading our emails, we treat personal information in accordance with all of the practices and safeguards described previously. Additionally, the following information describes our policies regarding cookies, “do not track” signals, interest-based advertising and third-party analytics.

#### **Cookies and similar technologies**

We and our third-party service providers may use cookies, web beacons (also known as a pixel tag or clear gif) and similar technologies on our websites, in our mobile application and in email messages. Cookies are small amounts of data that are sent to your internet browser from a web server and stored on your computer’s local storage. Cookies help us collect information about visitors to our websites, including date and time of visit, web pages viewed, amount of time spent on our websites or general information about the device used to access our websites. Our cookies and similar technologies do not contain any personally identifying information.

The information they provide may be used for various purposes, including creating aggregate statistics, determining audience size, measuring traffic patterns, analyzing clickstreams, helping keep your session secure, and providing relevant advertisements. If you do not wish to receive cookies, most internet browsers allow you to turn cookies off so that you do not receive them. If you do turn your cookies off, you will not be able to use some services or features.

#### **Do we honor “do not track” signals?**

Some internet browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. How browsers communicate the “Do Not Track” signal is not yet uniform. For this reason, our websites do not have the ability to respond to “Do Not Track” signals.

#### **Interest-based advertising and third-party analytics**

We may advertise our products and services on our websites and on websites not affiliated with us. We may contract with third-party advertising companies and social media companies to display these ads, and they may use cookies and similar technologies to optimize the placement of our ads. When we hire third-party online advertising companies, they may provide you with advertisements about our products and services that may be relevant to your interests, as determined, for example, by your activity on our websites or in our mobile application, or your interaction with our emails. Such advertisements are known as "interest-based advertisements." We do not control the opt-out mechanisms of these third party ad partners. To avoid tracking by these third party ad partners, you may be able to change your browser settings to reject third-party cookies or add a plug in to your browser to enable a Do

Not Track feature – though we have no control over and cannot confirm whether these third parties honor the Do Not Track browser signal. For social media companies, you may be able to adjust your privacy settings to opt-out of interest-based advertisements. Additionally, many advertising companies are members of the Network Advertising Initiative (NAI) or the Digital Advertising Alliance (DAA) which provide opt-outs for member companies at [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices) or [www.aboutads.info/choices](http://www.aboutads.info/choices).

We use Google Analytics to track activity on our websites, in our emails and in our mobile application and to engage in analysis, auditing, research, and reporting. We have enabled user ID tracking in Google Analytics which allows Google to track your activity on our websites, in our emails and in our mobile application, however, your identity is still anonymous to Google. We may use other third-party analytics service providers, and they may set and access cookies on your device and may use similar technologies to collect information about your interaction with our websites, our emails and our mobile application. Tracked activities include sites or screens visited, session duration and information about the way you use our services. The information generated about your use of our websites and mobile application, and your interaction with our emails may be transmitted to and stored by Google Analytics or such other third-party service provider. However, we do not share personally identifiable information with Google Analytics or any other third-party analytics service provider. By using our websites or mobile application or interacting with our emails, you consent to the processing of data about you by Google and any other third-party analytics service provider, as applicable, in the manner and for the purposes set forth above. Further information concerning the terms and conditions of use and data privacy for Google Analytics can be found at <https://policies.google.com/technologies/partner-sites>.

### **What choices are available to you regarding email communications?**

On occasion, we may use your email address to inform you of our products or services that we believe may be of interest to you. If you do not wish to receive future communications from us, you may update your communications preferences. You can also contact Investor Support at [support@financialengines.com](mailto:support@financialengines.com), and we will remove you from our email list. However, even if you choose not to receive emails from us, we may be required to send emails to you to comply with our legal and regulatory obligations.

### **How can you change your personal information?**

You can change your personal information by logging into your account. If you have any questions, please email Investor Support at: [support@financialengines.com](mailto:support@financialengines.com).

### **Changes to this policy**

We may change this policy from time to time without prior notice. Any changes to this policy will be promptly posted here so we encourage you to refer back to this policy regularly. Your interaction with our websites, mobile application or emails after any changes have been posted will constitute your agreement to the modified policy, and the modified policy will automatically apply to any information that we collect from the effective date of such modified policy.

### **Changes to the use of your personal information**

If we are going to use your personally identifiable information in a manner different from that stated at the time the information was collected, we will notify you via email, and you will have a choice as to whether or not we use your information in this way. We will rely on the contact information that you, your plan sponsor or your plan administrator provides to communicate any such notices to you.

### **Protecting children's privacy online**

Our products and services are not marketed to minors and we do not knowingly collect information from anyone under the age of 13.

**Contact us**

You can reach us in the following ways:

[Email: support@financialengines.com](mailto:support@financialengines.com)

Mail: 1050 Enterprise Way, 3<sup>rd</sup> Floor, Sunnyvale, CA 94089

Phone: (888) 443-8577