



Privacy Policy

INTRODUCTION

At Ellevest Financial, Inc. (“Ellevest”), we work hard to protect your personal information and ensure your information is kept secure. The following privacy policy outlines the types of personal information that Ellevest collects when offering our products and services, which include the Ellevest website (www.ellevest.com). Privacy is important to us. If you have any questions, please send us an e-mail at support@ellevest.com.

INFORMATION THAT WE COLLECT FROM YOU

When you visit the Ellevest website, we collect certain anonymous information about you, including, among other things, device-related information (e.g., browser type and IP address) and server log information (e.g., the date and time when you visit the website). We also collect information that you input into our website. We use this information to better understand our visitors and our business, to provide the services you request, and to enhance the Ellevest service.

To collect information about your visit to the Ellevest website, we use tools such as cookies, pixels and analytic services. Cookies are small pieces of data that are stored on your computer, mobile phone or other device. Pixels are small code blocks on a website or email that allow for another server to measure viewing of a webpage or email and often are used in connection with cookies. We use cookies in order to improve your experience with the Ellevest website. We use a cookie that only stores anonymous information to distinguish users between visits. Cookies and similar technologies are not required for site functionality. You are not required to accept cookies to use this site.

We use analytics tools such as “Google Analytics” (collectively referred to as “Analytics Services”) to collect information about the usage of the Ellevest website. These analytics services collect information such as how often users visit this site, what pages they visit, when they do so, and what other sites they used prior to coming to this site. We only use the information we get from these Analytics Services to improve this site.

These Analytics Services only collect the IP address assigned to you on the date you visit this site, not your name or other identifying information. The Analytics Services' ability to use and share information about your visits to this site is restricted by their terms of use and privacy policies. You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser. You can opt out of Google Analytics by installing the Google Analytics Opt-out Browser Add-on.

Additionally, if you wish to access our financial planning or asset allocation tools and services, you will be asked a series of questions to help us gauge your investment profile. In addition to asking about your financial goals and your plans for achieving them, we will ask you personal information such as your age, zip code, gender, education, marital status, dependents, salary, net worth, occupation, industry and savings and investment balances.

We collect and maintain the information you input in response to these questions. Additionally, when you become an Ellevest client, we will ask you for your full name, mailing address, date of birth, and social security number, along with your employment status and employer information (if applicable). We collect and maintain the information you input in response to these questions. In addition, we also collect personal information if you contact us or otherwise give it to us (e.g., in an e-mail).

HOW WE USE YOUR PERSONAL INFORMATION

As a Registered Investment Advisor, we are obligated to assess your financial situation in order to provide our services to you. We also use your personal information to enhance your customer experience, operate and maintain your account in accordance with US law, investigate and understand how the Ellevest website and service is used, monitor and protect the security and integrity of Ellevest and our service, and better market and advertise Ellevest's services.

As part of this process, we may from time to time aggregate some of your personal information in certain data analysis, reports, or other interpretations of investment trends for both internal and external purposes. When aggregating personal information, we make sure that the information is not identifiable to any particular customer.

We may share your personal information with third parties for the purpose of serving you as a client, but in no event will we sell or otherwise provide your personal information so that others might market their services to you. For example we may provide this information to an outside service in order to verify your identity. We may share the information required to become a Client of our selected broker dealer custodian solely for the purpose of allowing

them to provide their brokerage account services to you. We have entered into agreements that require that these third parties keep this information confidential. We also may disclose some of the personal information we collect to service providers that perform marketing and analytics services on our behalf, or to other financial institutions so that we can better serve you as a client.

We may disclose personal information in response to service of legal process, such as a court order, summons, subpoenas, or as permitted or required by law when we reasonably believe it is necessary or appropriate to investigate, prevent, or take action regarding illegal activities, suspected fraud, front running or scalping, situations involving potential threats to the physical safety of any person, or violations of our Terms of Use or customer agreements.

Information about our users, including personal information, may be disclosed or transferred to entities now or in the future affiliated with Ellevest or as part of any merger, acquisition, change of control, debt financing, insolvency, bankruptcy or sale of our assets. Such information may be used in the businesses of any entity so receiving it.

YOUR CHOICES AS A CONSUMER

In order to operate the Ellevest service and to provide services to our clients, we require certain personal information. You may choose not to provide such personal or financial information. However, we cannot provide services to you without such information.

HOW YOU ACCEPT THIS POLICY

By using the Ellevest service, or otherwise providing us with personal information (such as an e-mail address) you agree to the terms and conditions of this Privacy Policy.

CHILDREN

Our service is not directed towards anyone under the age of 18. If a parent or guardian becomes aware that his or her child, under the age of 18, has created an account with Ellevest and/or provided us with personally identifiable information, please contact us at support@ellevest.com.

Additionally, if we become aware at any point that a child under the age of 18 is using our service, we will terminate his or her account.

HOW YOU CAN ACCESS OR CHANGE YOUR PERSONAL INFORMATION THAT WE HAVE COLLECTED

Once you have registered with Ellevest, you can access your profile, review the information that we have collected from you, and revise that information. If you have any problems, you may also contact us at support@ellevest.com.

PROTECTION OF PERSONAL INFORMATION

Ellevest works diligently to protect your personal information. We employ several physical and electronic safeguards to keep your information safe. We use robust browser encryption, store all of our data on servers in secure facilities, and implement systematic processes and procedures for securing and storing data. We limit access to your personal and financial information to only those employees with authorized access, and we require third parties who perform services for Ellevest agree to keep your information confidential. Furthermore, if you choose to close your account or your account is terminated with us, we will continue to adhere to the privacy policies and practices outlined here.

CHANGES TO THE POLICY

We may modify this privacy policy over time. Any changes to the privacy policy will be reflected on this page and will become effective immediately upon posting. If the changes are significant, Ellevest will do our best to notify you via email or through a notification on the site. Please check the effective date below to determine if there have been any changes since you have last reviewed the Ellevest privacy policy.

YOUR RIGHTS AS A CALIFORNIA RESIDENT

Residents of California have the right to request from us certain information with respect to the types of personal information we share with third parties for those third parties' direct marketing purposes and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To exercise your rights, you may make one request each year by emailing us at support@ellevest.com. Your request should specify your full name and the email address you used when submitting personal information to us.

YOUR RIGHTS AS A VERMONT RESIDENT

We do not share nonpublic personal financial information we collect about Vermont residents to non-affiliated third parties except for our everyday business purposes or as otherwise permitted by law. If you wish to revoke any authorization to share your nonpublic personal financial information, which you have provided to us through by entering into our Customer Agreement, please contact us at support@ellevest.com.

Please note, however, that we will not be able to provide you with services through Ellevest without the ability to share this financial information.

INTERNATIONAL VISITORS

This Service is hosted in the United States. If you are an international visitor, you should note that by providing your personal information, you are: (i) permitting the transfer of your personal information to the United States which may not have the same data protection laws as the country in which you reside; and (ii) permitting the use of your personal information in accordance with this Privacy Policy.

QUESTIONS

If you have any questions on the privacy policy, please contact us at:

Ellevest
48 West 25th Street
6th floor
New York, NY 10010

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