



Privacy Policy

This Privacy Policy (“Privacy Policy”) describes how Investment Link, LLC (“Investment Link” or “we” or “us” or “our”) and our online services through www.myinvestmentlink.com (“Site”) collect, use, and share your personal information when you or any other person on your behalf visit this Site or use any other products and services offered and managed by Investment Link.

1. Our Commitment to You

Your privacy is important to us and we are committed to protecting the personal information you provide to us. We hold all personal information provided by our clients in the strictest confidence and it is our objective to protect the privacy of all clients. Except as permitted or required by law, we do not share personal information about our clients with nonaffiliated parties. We do not sell, rent, or trade your personal information to anyone. We work hard to protect your privacy and provide you with the information you need to help you keep your personal information private and secure.

2. How You Accept this Privacy Policy

By using and continuing to use Investment Link or our Site or our products and services or otherwise providing us with any information you or any other person on your behalf agree to and bound by all provisions of this Privacy Policy and any updates thereto. This Privacy Policy may change from time to time without prior notice. This is our entire and exclusive Privacy Policy and it supersedes any earlier version.

3. Information We Collect and Why

A. General Information

Investment Link collects various types of information about you, such as your device-related information, server log information (including the date and time of day of your visit, average time spent on our Site, browsing activity, number and frequency of visitors, include the websites that you access immediately before and after your visit to our Site, the Internet browser you are using, your IP address, and any site that referred you to Investment Link). We also collect information that you input into our Site, e.g., by beginning the subscription sign up process or by commenting on the Investment Link blog. We use this information to better understand you and our business, facilitate site navigation, provide the services or information you request, and enhance the Investment Link service. We will not disclose any information to third parties that could be used to identify you personally.

B. Personal Information

Personal Information means personally identifiable information such as information you provide via mail, email, over the phone, forms, surveys, applications, subscriptions, or any other online fields on our Site. When you or any other person on your behalf choose to subscribe or started the subscription process to create an account or otherwise sign up with Investment Link, we may also collect certain personal information about you and your spouse or partner, including user name, password, account numbers, full legal name, email address, permanent address, date of birth, retirement date and age, social security number, gender, detailed information on retirement and nonretirement accounts, types of investments, and

information about personal financial situation and status. Additionally, once you enter and submit your user name and password, the Site will recognize who you are and will collect all information that you submit, including all electronic instructions (including all transaction information), and any information collected about you from this Site may be associated with other identifying information that we have about you.

C. Referral Discount Program

Investment Link offers and manages a referral program. The program potentially allows our customers to permanently lower their subscription fee for referring other individuals who ultimately become a client of Investment Link. Participation in our referral program is free and voluntary. By participating, you or any other person on your behalf may provide us with certain information about you and the person to whom you refer our service to, such as the full name and e-mail address. We treat this information like all other personal information and in accordance with this Privacy Policy.

D. Employers and Organizations Discount Program

Investment Link offers a discount program for all current and former employees and members of subscribed employers or organizations. When such employer or organization registers with Investment Link to receive a permanent discount code, we will collect information on both the employer or organization and its employees or members, including but not limited to, the employer's or organization's name, address, contact information, requester's name and contact information, and other relevant information. In addition, when the employee or the member visits our Site we will collect their information according to this Privacy Policy.

E. Financial Professionals Discount Program

Investment Link may offer a discount program for financial professionals. When such financial professional registers with Investment Link, we will collect the information on the financial professional's organization, financial professional, and their clients, including but not limited to, the organization's name, address, contact information, and other relevant information. We will also collect certain personal information about the financial professional, including, but not limited to, full name, title, dates of birth, addresses, length of service with their organization, gender, email addresses, and other contact information. In addition, when the financial professional provides their client's information to Investment Link, we will collect their information according to this Privacy Policy.

F. Other Ways We Collect Information

We may collect various other types of personal information from you if you contact us or otherwise give it to us (e.g., in an email, phone call, or through any other way you communicate with us).

G. E-mail and Marketing

Investment Link does not sell, rent, or trade any e-mail addresses, nor will we provide your personal information to third parties for their marketing purposes.

We recommend that you do not send us any individual personal information via non-secure methods of correspondence, including via public electronic communication channels, such as Internet e-mail, which are generally not secure.

4. Additional Information We Collect Online

Investment Link Site may use a variety of technologies, such as cookies, pixels, web beacons, and similar mechanisms, to collect information that helps us understand how our site is used. Specifically, when you visit our Site, we or our third-party service providers may automatically collect a variety of technical and navigational information about you via these technologies. We also may use similar tracking technologies in emails that we or our third-parties send to you on our behalf. This information may be used, for example, to alert you to software compatibility issues or to resolve technical or service problems. We also analyze this information, with the assistance of our service providers, to improve our web design and functionality, to enhance our ability to serve you and your accounts, and to tailor our communications to you regarding our products and services.

A. Cookies

Cookie is a small file of letters and numbers that is downloaded and stored on your computer when you visit a website. Cookies are used by many websites and offer a number of benefits, e.g., remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

For more information please see Cookie Policy: www.myinvestmentlink.com/legal/cookies/

B. Web Beacons

Our Site and the emails that you receive from us may use an application known as a web beacon. A web beacon is a tiny transparent image embedded in a webpage or an email to measure usage and activity. Our Site may offer customized features that require our use of cookies and web beacons. Web beacons allow us, directly or through our third-party service providers, to collect information used for website analytics, such as how many users have visited particular pages or downloaded documents on our site, or how frequently users search for a particular term on our site.

C. Third-Party Analytics

We use third-party analytics tools, including “Google Analytics”, to collect information about the usage of our Site, but not your personal information. These third parties may set a cookie on the device used to access our Site and may use web beacons to collect information about your activity on our Site. We use this information to improve our Site, engage in analysis, auditing, research, and reporting.

D. Advertising Companies

We may advertise our products and services on websites not affiliated with Investment Link, and we may contract with third-party advertising companies to display our ads. These third-party advertising companies, along with data exchanges and similar providers, may use cookies and similar technologies to collect technical and web navigational information, such as device type, browser type, Internet protocol address, and pages visited.

Investment Link and these third-party online advertising companies may use the data collected, along with other information we have about you and your Investment Link relationships, to serve relevant ads to you. The advertisements may be relevant to your interests, as determined by your activity on our Site and non-Investment Link websites. These are known as "interest-based advertisements."

You may opt-out of receiving interest-based advertisements from online advertising companies. For more information about interest-based advertising please see http://www.networkadvertising.org/managing/opt_out.asp.

Non-Investment Link websites and mobile applications are not subject to Investment Link's Privacy Policy. You may visit the individual sites for additional information on their privacy practices.

5. How We Handle Your Personal Information

Investment Link does not sell, rent, or trade the personal information about current or former clients or their accounts to third parties.

A. How We Use Your Personal Information

We will use your personal information to respond to your inquiries and requests, provide customer support, and operate and maintain your account, personalize your experience on our Site, inform you about important information regarding our Site, changes to terms, conditions, policies, and other administrative information.

Additionally, we may use your personal information to contact you regarding our own services or resources that we think may be of interest to you, allow you to participate in surveys and other forms of market research, sweepstakes, contests and similar promotions and to administer these activities. If you no longer wish to receive such marketing communications from us, please click the “unsubscribe” link that can be found in each email message.

We may from time to time aggregate some of your personal information in certain data analysis, reports, or other interpretations of investment trends, including data analysis, audits, developing and improving products and services, enhancing our Site, identifying usage trends and determining the effectiveness of promotional campaigns for both internal and external purposes. When aggregating personal information, we make sure that the information is not identifiable to any particular client.

B. Third-Party Service Providers

In general, the third-party service providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us.

We may use various service providers to operate our Site and employ other persons to perform work on our behalf, such as sending postal mail and emails. These persons may have access to the personally identifiable information you submit through our Site, but only for the purpose of performing their duties. These personnel may not use your personally identifiable information for any other purpose.

However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your transactions. For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers.

C. Compliance with Laws

We do not automatically collect personally identifiable information from visitors to our Site, except to the extent we are required to do so pursuant to some statute or regulation applicable to us. We will not provide any personally identifiable information to any other persons, except if we are required to make disclosures

by any law, any government or private parties in connection with a lawsuit, subpoena, investigation or similar proceeding.

6. How We Share Your Personal Information

We may disclose personal information, without notice, in response to service of legal process, such as a court order, summons, or subpoena, 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 (including identity theft), situations involving potential threats to the physical safety of any person, or suspected violations of any of our policies, terms, conditions, and agreements.

A. Sharing Information with Other Companies Permitted Under Law

To provide financial services and for everyday business purposes, we may share your personal information with third parties, including consumer identification verification services, public accounting firms, and certain other service providers (including companies that perform marketing and analytics services). If such services are employed, we would have entered into agreements that require that these third parties keep this information confidential.

In the event that the firm has a change to its Privacy Policy that would allow it to disclose non-public information not covered under applicable law, the firm will allow its clients the opportunity to opt out of such disclosure.

B. Former Customers

Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality.

7. Other Important Information

A. Security

Investment Link takes reasonable steps to protect your personal information from loss, misuse, unauthorized access, alteration, disclosure, or destruction. When you or any other person on your behalf enter sensitive information, such as a credit card number or any financial information, on our forms, we or our third-party service providers protect the transmission of that information using various technologies. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. Please note that no method of transmission over the Internet, or method of electronic storage, is 100% secure, however.

B. Children

Investment Link is not to be used by anyone under the age of 18 and, as such does not knowingly or intentionally collect personal information from anyone under the age of 18, and no part of our website is structured to attract anyone under the age of 13. If a parent or guardian becomes aware that his or her child under the age of 18 has created an account with Investment Link and/or provided us with personally identifiable information, please contact us at support@invlnk.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.

C. Social Media and Links to Other Sites

When you click on links on our Site, they may direct you away from our Site. We are not responsible for the privacy practices of other websites and encourage you to read their privacy policy statements.

Investment Link may provide experiences on various social media platforms (such as Facebook, Google+, YouTube, LinkedIn, Twitter, etc.) that enable online sharing and collaboration among users who have registered to use them. Any content you post on official Investment Link managed social media pages, such as pictures, information, opinions, or any personal information that you make available to other participants on these social media platforms, is subject to the Terms of Use and Privacy Policies of those respective platforms. Please refer to them to better understand your rights and obligations with regard to such content. In addition, please note that when visiting any official Investment Link managed social media pages, you are also subject to Investment Link's Privacy Policy and Investment Link's Social Media Terms of Use, which can be accessed at www.myinvestmentlink.com at the bottom of the page.

D. 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@invlnk.com. Your request should specify your full name and the email address you used when submitting personal information to us.

E. 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, please contact us at support@invlnk.com. Please note, however, that we will not be able to provide you with services through Investment Link without the ability to share this financial information.

F. International Visitors

The Investment Link Site is designed for residents of the United States only. The information provided on this Site or in any communication containing a link to this Site is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to law or regulation or which would subject Investment Link to any registration requirement within such jurisdiction or country. Neither the information, nor any opinion contained on this Site constitutes a solicitation or offer by Investment Link to buy or sell any securities or other financial instruments or provide any investment advice or service.

G. Changes to this Privacy Policy

Investment Link reserves the right to amend this Privacy Policy at any time without notice. You may be asked to provide your consent to the updated versions of this Privacy Policy in the event of a material change to the information contained within it. The current version of this Privacy Policy can be accessed at www.myinvestmentlink.com/legal/privacy-policy.

8. How You Can Help Protect Yourself

A. Online Security

The internet offers access to a world of products and services, entertainment and information. At the same time, it creates opportunities for scammers, hackers, and identity thieves. Learn how to protect your computer, your information, and your online files.

Source: Federal Trade Commission
www.consumer.ftc.gov/topics/online-security

B. Limiting Unwanted Calls & Emails

Some phone calls and emails are important, some can be annoying, and others are just plain illegal. Learn how to reduce the number of unwanted messages you get by phone and online.

Source: Federal Trade Commission
www.consumer.ftc.gov/topics/limiting-unwanted-calls-emails

C. Identity Theft

While identity theft can happen to anyone, there are some things you can do to reduce your risk. If you think someone is using your personal information to open accounts, file taxes, or make purchases, visit IdentityTheft.gov to report and recover from identity theft.

Source: Federal Trade Commission
www.consumer.ftc.gov/topics/identity-theft

9. Contact Information

We welcome your inquiries or comments. Please visit www.myinvestmentlink.com/contact-us or contact us by mail or email.

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