

Aperio Group, LLC

Privacy Policy

This Privacy Policy (the “**Policy**”) for Aperio Group, LLC (“**Aperio**”) describes the policies and procedures we use to collect, use, disclose, share and protect your Personal Information. When we use the term “**Personal Information**” we are referring to your personally identifiable information such as your name, email or mailing address, phone number, account credentials (user id and passwords), social security number, government ID numbers and other information that can be used to identify you personally.

Aperio (which may be referred to as “**Aperio Group**,” the “**Company**,” “**we**,” “**us**” or “**our**”) has adopted the Policy, and together with our [Terms of Use Agreement](#), to govern your use of our website and client portal (the “**Portal**”).

Aperio is committed to the protection of privacy for our users and clients (also referred to as “**you**” or “**your**”). Aperio’s core business is asset management, which means we are fully focused on serving the investment interests of our clients. We have no incentive to sell your Personal Information to other parties.

How to Use the Policy

The Policy describes if, when and how your Personal Information is shared and/or disclosed, how we collect and use other information and how we address other privacy matters – such as deletion of your Personal Information upon request, and how to opt-out of marketing communications. We also provide contact information for your questions or concerns.

FACTS

WHAT DOES APERIO GROUP, LLC 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?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Assets and account balances
- Investment experience and risk tolerance
- Tax planning information
- Information about your beneficiaries

When you are *no longer* our customer, we continue to share your information as described in this notice.

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 Aperio Group chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Aperio Group 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 do not share

For our affiliates' everyday business purposes—information about your transactions and experiences	No	We do not share
For our affiliates' everyday business purposes—information about your creditworthiness	No	We do not share
For our affiliates to market to you	No	We do not share
For nonaffiliates to market to you	No	We do not share

APERIO GROUP, LLC

What we do

How does Aperio Group protect my personal 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 buildings.
How does Aperio Group 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 enter into an investment advisory contract ■ Give us your income information or provide employment information ■ Tell us about your investment or retirement portfolio or give us your contact information <p>We also collect your personal information from 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 below for more on your rights under certain state law.</p>

Definitions

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Aperio Group has no affiliates</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Aperio Group doesn't 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>Aperio Group doesn't jointly market</i>

Questions?

Call us at 415-339-4300

Other important information

Information for Vermont, California and Nevada Customers

Vermont: In response to a Vermont regulation, if applicable, we disclose personal information about you to non-affiliated third parties with whom we have joint marketing agreements, we will only disclose your name, address, other contact information, and information about our transactions or experiences with you.

California: In response to a California law, we automatically treat accounts with California billing addresses as if you do not want to disclose personal information about you to non-affiliated third parties except as permitted by the applicable California law. In addition, we do not sell your personal information.

Nevada: Nevada law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling 415-339-4300. To obtain further information, contact the Bureau of Consumer Protection, Office of the Nevada Attorney General at 555 E. Washington Ave., Suite 3900, Las Vegas, NV 88101; phone 1-702-486-3132; or email BCPINFO@ag.state.nv.us.

Information for Individuals Located in Europe

Aperio Group does not operate in the European Economic Area (EEA) and, therefore, any processing of personal information from individuals located in the EEA is incidental. If you are located in the EEA, we will ask for your consent to transfer and store your personal information in the United States. Should you have questions regarding the collection or processing of your personal information, please contact us at operations@aperiogroup.com.

Protecting Children’s Privacy Online

Aperio Group’s marketing and services are not directed to individuals under the age of thirteen (13), and those children should not provide Personal Information through our website or Portal. We do not knowingly collect information from children under 13 without parental consent. For more information about the Children’s Online Privacy Protection Act (COPPA), visit the Federal Trade Commission [website](#).

Modifications to our Privacy Policy

We change our privacy practices from time to time as the need arises. When we do, we will revise this Privacy Policy and we will post the revised document on our website.

When changes to this Privacy Policy are material, we will provide notice to clients.

Privacy Questions, Comments or Feedback?

Please contact us:

Attention: Privacy & Security
Aperio Group
Three Harbor Drive, Suite 204
Sausalito, California 94965

Email us at operations@aperiogroup.com

Call us at 415-339-4300

We may not respond to automated requests or other requests that do not appear to be legitimate.

This update adopted as of March 15, 2019