



# Website Privacy Policy

Last updated: 03-15-2019

Firstmetric, LLC ("Firstmetric", "Company", "we", "us", "our") is serious about protecting the privacy of your personal information we collect through our website. This Privacy Policy ("Policy") describes the ways Firstmetric® collects, protects, uses and stores your personal information we collect through our website located at <https://www.firstmetric.com> ("Website"). We may change this Policy from time-to-time. If we make changes, we will notify you by posting the updated Policy and revising the "Last Updated" date above. The most current version of the Policy will govern our use of your personal information and will always be at <https://www.firstmetric.com/legal>. By continuing to access or use our products and services through our Website, collectively the ("Services") after those changes become effective, you agree to be bound by the revised Policy.

This Policy applies only to the Website operated by Firstmetric®, and does not apply to the practices of companies that Firstmetric® does not own or control, or to individuals that Firstmetric® does not employ or manage. Our Website may contain links to other websites. Firstmetric® is not responsible for the privacy policies and/or practices on those other websites. When linking to another site a visitor should read the privacy policy stated on that website.

## Collection of Information

### Information Regarding Clients

Information about how we may collect, maintain, and use non-public and personal information regarding current, prospective, and former clients, and the measures we take to protect that information, is subject to our Consumer Privacy Policy, which can be viewed at <http://www.firstmetric.com/legal>. Such information may be collected by us through forms, applications, and other documents you complete, in meetings, telephone calls, and communications (such as emails), in password-protected portions of our Website and/or through other means.

### Information You Provide to Firstmetric®

We receive and store any information you knowingly provide to us in connection with the Services of Firstmetric®. For example, we collect information that you provide to us when you communicate with us. If

you request information from us through an online Website contact form, we collect the information you provide (e.g., name, business name, telephone number, email address, etc.) so that we can respond to your request. In addition, from time to time our Services may request information from you via surveys or contests, or to receive a particular Service, such as a newsletter. Participation in these surveys or contests is completely voluntary and you have a choice whether or not to disclose the requested information. Information requested may include contact information and supplementary information about your current investment management practices. When click our live chat feature or chat with our bot on our Website, then Firstmetric®, or our third party service providers, capture certain information about such as location, browser, etc. We also record live chat transcripts for quality and training purposes to improve our Services as well as to comply with federal securities laws.

## Information Firstmetric® Collects from You

When you visit the Website to use our Services, we may collect information sent to us by your computer, mobile phone or any other device. This information may include your IP address, device information including but not limited to identifier, name and type, operating system, location, mobile network information and standard web log information, such as your browser type, traffic to and from our site, the pages you accessed on our Website, and any other available information.

When you use our Services, we may also store information based on your usage history. This includes, but is not limited to, content you viewed, event information, click stream information, and cookies that may uniquely identify your browser.

## Information Firstmetric® Collects from Other Sources

You may choose to provide us with access to certain personal information stored by third parties such as social media sites (such as LinkedIn, Facebook, Twitter and Instagram, etc.). The information we have access to varies by site and is controlled by your privacy settings on that site and your authorization.

## Use of Information

Firstmetric® uses data collected to perform the Services requested. For example, if you fill out a "Contact Me" or "Get Started" web form, the Company will use the information provided to contact you about your interest in our Services. The Company may also use information it collects for marketing purposes. For example, the Company may use information you provide to contact you to further discuss your interest in our Services and to send you information regarding the Company, its affiliates, and its partners, such as information about promotions or events.

## Sharing of Information

### Authorized Service Providers

Authorized service providers of Firstmetric® are companies that perform certain services on our behalf. This also includes financial institutions that are custodian for client accounts. These services may include fulfilling orders, processing reports, delivering packages, providing customer service and marketing assistance, performing business and sales analyses, supporting our Website functionality, and supporting contests, sweepstakes, surveys or other Services offered. These service providers may have access to your personal data to the extent necessary to perform their functions, but we do not allow them to share or use any of your personal information for any other purpose.

### Compelled Disclosure

Firstmetric® reserves the right to use or disclose information provided if required by law or if the Company reasonably believes that use or disclosure is necessary to protect the Company's or your rights and/or to comply with a judicial proceeding, court order, or legal process.

### Selling Information to Third Parties

We don't rent or sell your personal information in personally identifiable form to any third parties.

## Third Party Advertising and Analytics

We may allow third parties to serve advertisements in connection with our Services. These third parties may use cookies, web beacons, and other technologies to collect information, such as your IP addresses, identifiers associated with your mobile device or applications on the device, the browsers you use to visit our Website, pages viewed, time spent on pages,

links clicked, and conversion information. This information may be used by Firstmetric® and other companies to analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests, and better understand your usage. This policy does not apply to, and we are not responsible for, third-party cookies, web beacons, or other tracking technologies, and we encourage you to check the privacy policies of these third parties to learn more about their privacy practices. For more information about targeted advertising specifically, or to opt out of having your browser information used for these purposes, please visit <http://www.aboutads.info/choices>.

## Security

Firstmetric® employs reasonable technical, administrative and physical safeguards to protect the confidentiality and security of your personal information. We use industry-recognized technical safeguards, such as, but not limited to encryption, firewalls, SSL (Secure Socket Layer) and have procedures to protect your information from loss, misuse or unauthorized alteration.

## Opt-Out Policy

You have a choice about how we use your personal information to communicate with you, and you may opt out at any time by unsubscribing or changing your preferences by sending us an email at [privacy@firstmetric.com](mailto:privacy@firstmetric.com). You may also opt out of receiving promotional emails from Firstmetric® by following the instructions in those emails. If you opt out of receiving promotional emails or communications, we may still send you non-promotional communications pertaining to your ongoing business relationship with Firstmetric®.

## Additional Information

### Cookies

Most web browsers are set to accept cookies by default. Like many websites, Firstmetric® uses cookies and similar technologies to collect additional website usage data to improve our Services, but we do not require cookies for many parts of our Services. A cookie is a small data file that is transferred to your computer or mobile device. Firstmetric® may use both session cookies and persistent cookies to better understand how you interact with our Services, to monitor aggregate usage by our users and web traffic routing on our Services, and to customize and improve our Services. Session cookies exist during one

session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer. If you prefer, you can set your browser to remove or reject cookies, however, some Services may not function properly if you disable cookies.

### **Internet Protocol (“IP”) Addresses**

When you visit Firstmetric®’s websites, the Company collects your IP addresses to track and aggregate non-personal information. For example, Firstmetric® uses IP addresses to monitor the regions from which visitors navigate the Company’s Website or the devices they use to visit the Company’s Website.

### **Email Tracking**

Some emails that we send to you have no tracking links. Other emails we send we put in tracking so that we can tell how much traffic those emails send to our Website. Examples of these emails are typically related to promoting our Services.

### **Aggregated Personal Data**

To better understand our visitors, we may analyze the personal data that is provided to our Services in aggregate form. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents and business partners. We may also disclose aggregated user statistics in order to describe our Services to current and prospective business partners, customers and to other third parties for other lawful purposes.

### **Correcting and/or Updating Your Information**

You may change, update or correct information about yourself at any time by sending us an email at [privacy@firstmetric.com](mailto:privacy@firstmetric.com). We may retain archived copies of information about you, your business, and your relationship with Firstmetric® for a period of time that is consistent with federal securities laws.

### **International Users**

OUR WEBSITE IS INTENDED FOR RESIDENTS OF THE UNITED STATES ONLY. IF YOU ACCESS OUR SITE FROM OUTSIDE THE UNITED STATES, YOU EXPRESSLY CONSENT TO OUR PROCESSING OF YOUR PERSONAL INFORMATION ACCORDING TO THIS PRIVACY POLICY. YOUR PERSONAL INFORMATION MAY BE PROCESSED BY US IN THE COUNTRY WHERE IT WAS COLLECTED AND IN THE UNITED STATES; UNITED STATES LAWS REGARDING

PROCESSING OF YOUR PERSONAL INFORMATION MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY.

### **Organizations**

IF YOU REPRESENT AN ORGANIZATION, YOU MUST ENSURE THAT EACH MEMBER OF YOUR ORGANIZATION (INCLUDING EMPLOYEES AND CONTRACTORS) ABOUT WHOM PERSONAL INFORMATION MAY BE PROVIDED TO US HAS GIVEN EXPRESS CONSENT TO OUR PROCESSING OF SUCH PERSONAL INFORMATION ACCORDING TO THE TERMS OF THIS PRIVACY POLICY.

### **California Privacy Rights**

Pursuant to Section 1798.83 of the California Civil Code, residents of California can request certain details about information we disclose to third parties for direct marketing purposes. If you are a California resident and would like to request this information, please contact us at the mailing address below or email us at [privacy@firstmetric.com](mailto:privacy@firstmetric.com).

### **Policy Towards Children**

Our Website and Services are not intended or directed to persons under age 13, and we do not knowingly collect information from children under the age of 13. By using the Website and Services, you are representing that you are at least age 18, or that you are at least 13 years old and have your parents’ or guardians’ permission to use websites. In the event that we learn that we have collected personal information from a child under age 13 we will take steps to remove and/or delete such information. If you believe that we might have any information from or about a child under 13, please contact us at [privacy@firstmetric.com](mailto:privacy@firstmetric.com).

### **Contacting Us**

Please contact us if you have any questions or concerns regarding our Website Privacy Policy.

**Firstmetric, LLC**  
**Attn: Compliance Department**  
**200 E. Big Beaver Road**  
**Troy, MI 48083**

Phone: (800) 801-6855 | (248) 817-8919  
Fax: (248) 817-8791  
Email: [privacy@firstmetric.com](mailto:privacy@firstmetric.com)

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