

Privacy Policy

United Capital Financial Advisers, LLC and its affiliates (“United Capital”, “we”, “us” or “our”) respect your privacy and are committed to complying with this privacy policy (“Privacy Policy”), which describes what information we collect about you, our customers or prospective customers and clients of our partners, independent partners and licensees, including how we collect it, how we use it, with whom we may share it and what choices you have regarding our use of your information. United Capital's partners and licensees may include registered investment advisers, independent broker dealers and other parties with whom United Capital has a business relationship. This Privacy Policy applies to information collected through our websites that link to this policy (the “Websites”) which include but are not limited to: <http://www.unitedcp.com/>, <http://www.unitedcp.com/finlife/>, <http://unitedcp.com/the-money-code/>, <http://www.findyourmoney.com>, <http://www.joinunitedcapital.com>, <http://www.finlifepartners.com>, <http://trivia.unitedcp.com/trivia>, <http://tradeoffs.unitedcp.com/tradeoffs>, http://visionboard.unitedcp.com/vision_boards, and <https://www.flexscore.com/>, any mobile applications associated with the Websites (the “Mobile Applications”) and all other online offerings that post a link to this Privacy Policy, whether accessed via computer, mobile device or other technology or any associated content, material, or functionality contained on the Websites or Mobile Applications (the “Services” and, together with the Websites and the Mobile Applications, collectively, the “System”). Our privacy practices with respect to personal information collected from or about you through other means, including offline, will be described in the privacy policies or notices you receive in connection with the financial products or services you obtain from us.

This Privacy Policy does not apply to information about you collected (i) by third party services, applications or websites, or advertisements associated with, linked to or otherwise accessible from the Services (including by a third party payment processor) or (ii) by third party individuals, financial institutions or financial advisors or companies with which you conduct transactions or communications facilitated through use of the Services (“Third Party Transactions”). The information collected and received by such third parties is subject to their privacy policies and under no circumstance is United Capital liable for the third party's compliance therewith. You should review the privacy policies of third parties with whom you conduct or engage in Third Party Transactions.

This Privacy Policy is incorporated into and is a part of the terms of use of the System located [here](#). We encourage you to become familiar with the terms and conditions of both this Privacy Policy and the Terms of Use. By accessing and using the System, or any part thereof, you agree that you have read and understand this Privacy Policy, and that, in exchange for access to the System, you accept and consent to the privacy practices (and any uses and disclosures of information about you) that are described in this Privacy Policy.

Changes to our Privacy Policy

We may change this Privacy Policy at any time and from time to time. The most recent version of the Privacy Policy is reflected by the version date located at the bottom of this Privacy Policy. All such updates and amendments are effective immediately upon notice thereof, which we may give by any means, including, but not limited to, by posting a revised version of this Privacy Policy or other notice on the System. You should view this Privacy Policy often to stay informed of changes that may affect you. We expressly reserve the right to make any changes to this Privacy Policy at any time, without prior notice to you. Our electronically or otherwise properly stored copies of this Privacy Policy shall each be deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this Privacy Policy.

Information We Collect

As described in detail below, we may collect certain identifying information from or about you in connection with your use of, or your submissions to, the System (collectively, the "Collected Information").

We collect information when you give it to us (such as when you hire us for financial advice or investment management services or contact us or subscribe to our newsletter through the system), when you give us permission to obtain it, (such as when you give us permission to access your financial resources that contain your personal information including, but not limited to, your CPA, attorney, account custodian, other advisers or websites with your information), or when we obtain it from other sources such as from the business partners or third parties that makes our services available to you or from commercially available third-party sources, such as credit reporting agencies. We may combine information we receive from commercially available third party sources with the personal and other information we have collected about you pursuant to this Privacy Policy. We also collect technical information when you use our products and services.

Collected Information includes both Personal Information and information about how you interact with our system, each as described below:

- (i) We may collect information that can be used to identify you ("Personal Information"). Personal information that we collect depends on the product or service you have with us or access through us, and may include, without limitation: name, social security number, date of birth, contact information, account holdings and activity, financial account information, financial goals, asset and income information and biometric information.
- (ii) We also collect information regarding how you interact with the System, which information may include pages you view, links you click or hover over, selections you make on the Websites, your web browser's HTTP referrer header, features you use, preferences you set, your web browser

type and version, the operating System type and version of the device you are using to access the System, the Internet protocol (IP) address of the device you are using to access the System (or any portion thereof), general physical location, Internet service provider, in addition to any other information collected as further described in this Privacy Policy.

How We Use Collected Information

United Capital may use the information we collect for various purposes as permitted by applicable law, including, without limitation, to (i) provide the products, Services and System to you; (ii) personalize your experience; (iii) improve the System; (iv) improve our customer service; (v) process transactions; (vi) administer a contest, promotion, survey, or other System feature; (vii) send periodic emails; (viii) notify you about our products and services that may be of interest to you; (ix) improve our products and services, (x) notify you about changes to Site Policies. We may also use the information we collect as otherwise disclosed to you at the point of collection or for any other purposes with your consent.

Use of FlexScore Information

In addition to the uses of Collected Information described above, we may also use information collected when you access or use our FlexScore product, including personally identifiable information that you provide, to inform you about third-party products or services that may be of interest to you.

Cookies and Usage Reports

We may use technologies such as cookies, beacons, tags and scripts on our System. By placing a small file known as a "cookie" on your computer (or other device), United Capital and its partners, affiliates or third party providers may passively gather information about your use of the System for several reasons, including, but not limited to, the following: statistics collection and analysis, System optimization, analytics (as described below), market research, and maintenance of user login information. For example, cookies on the Websites may track "macro" information, such as the number of independent visits made to the Websites each day, or "micro" information, such as individual users' IP addresses, downloads, and related traffic history (some of this information may be collected by web beacons, see below). The information that we and our third party service providers track with cookies may include, but is not necessarily limited to, the type of browser (such as Google Chrome, Microsoft Edge or Internet Explorer) and Internet-connected device being used to access the System, your Internet protocol ("IP") address, your home domain or Internet service provider, your referrer URL (which is the URL for the website that you were viewing prior to visiting the System), how you were directed to the System, which specific pages you access on the System, how long you view each page, the time and date you access our System and the total number of visitors to the System and any portions thereof. We may also use your IP address to determine the general physical location of your computer or device and understand from what geographic locations our System visitors come and

to tailor our services to meet our visitors' needs (e.g., if a visitor is from California, we may use geolocation information to ensure our California team responds to such visitor).

Most popular Internet browser applications will allow you to configure the browser so as not to accept cookies. However, setting your browser to reject cookies may, in certain instances, prevent you from taking full advantage of the System (or some portion thereof) and its capabilities, or cause some features of the System to function improperly or more slowly.

The Websites use certain web analytics services provided by third parties in order to better understand your use of our Websites (or other portions of the System) and how we can improve the System. Such analytics providers may collect information such as how often users visit the System, what pages they visit when they do so, and what other websites they used prior to coming to the System. We do not combine the information collected through the use of such analytics services with your Personal Information. Such third party analytics providers may utilize the data collected to track and examine use of the System, to prepare reports on its activities and share them with us.

As part of our suite of analytics, we also utilize web analysis services provided by Google. Google's ability to use and share information collected by Google Analytics about your visits to the Websites is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). Google utilizes the data collected to track and examine the use of the System, to prepare reports on its activities and share them with other Google services. Google may use the data collected on the System to contextualize and personalize the ads of its own advertising network. To more fully understand how Google may use the data it collects on the System, please review "How Google uses data when you use our partners' sites or apps", (located [here](#) or any successor URL).

Some of the areas of the System may also contain electronic images known as web beacons (sometimes known as clear gifs) that allow United Capital, and its third party providers or affiliates, to count and track users who have visited certain portions of the System and other similar traffic history. Web beacons collect only limited information, including a cookie number, time and date of a page view, and a description of the page on which the Web beacon resides. Web beacons do not collect any of your Personal Information.

FlexScore

We partner with a third party to either display advertising on our web site or to manage our advertising on other sites. Our third party partner may use cookies and other technologies to gather information about your activities on the FlexScore site and other sites in order to provide you advertising based upon your browsing activities and interests. We may use cookies to track ad conversions.

How We Share Collected Information

We may share Collected Information with your consent. We may also share your information with any of our affiliates or subsidiaries as permitted by law, including for business purposes such as providing the System to you, processing your transaction, managing your account(s), offering our products and services to you, obtaining information about your transactions and experience or for any other purpose described in this Privacy Policy or the Terms of Use, or any other lawful purposes. United Capital also works with a number of non-affiliated companies that help service your account or assist us with providing the Services to you. United Capital may share pertinent information about you with these companies as permitted by applicable law. All such sharing of information with third parties will be subject to obligations of confidentiality between United Capital and the third party.

We may also disclose Collected Information if we become subject to a subpoena or court order, to report to credit bureaus, or if we are otherwise legally required to disclose information. We may use and disclose Collected Information to establish or exercise our legal rights, to enforce the Terms of Use, to assert and defend against legal claims, or if we believe such disclosure is necessary to investigate, prevent, or take other action regarding actual or suspected illegal or fraudulent activities or potential threats to the physical safety or well-being of any person.

For more information about how personal information may be shared, and your options for limiting such sharing, please see our [Consumer Privacy Notice](#).

We do not sell, rent, or lease our user lists or the identity of individual users to third parties without your consent. However, we may use and disclose certain aggregated, de-identified information to our affiliates, subsidiaries, business partners, third-party service providers or other recipients, as permitted by law for certain purposes including, without limitation, advertising, informational, comparison, research, general service or product improvement. Such information may also be shared with United Capital customers, including the company through which our service is made available to you. However, such information shall not be personally identifiable to any user. Information stored in United Capital's GuideCenter Vault will not be included in any such aggregated and de-identified datasets.

Disclosure of FlexScore Information

In addition to the disclosures of Collected Information described above, we may also disclose information collected when you access or use our FlexScore product, including personally identifiable information to: (1) third parties for marketing of third party products or services; (2) third party financial consultants- per your request- so that they can provide you with financial services, and (3) third party financial institutions as necessary for us to – per your request- pull your financial information for you to view/utilize on the website. Additionally, any user submissions to the FlexScore website may be disclosed to persons/groups as elected by you through your selection of website submission functionalities.

Change in Control and Other Organizational Changes

As United Capital grows and develops its business, it is possible that its corporate structure or organization might change or that it might merge or otherwise combine with, or that it or portions of its business might be acquired by, another company. If United Capital experiences a Change In Control (as defined below), then we may amend our privacy and information usage practices described in this Privacy Policy. Additionally, you should expect that Collected Information (including your Personal Information) would be one of the assets that will be transferred to the legal entity that succeeds our operation and ownership of the System. The privacy practices of the succeeding legal entity will then govern the Collected Information so transferred. However, if applicable law prohibits the succeeding legal entity's privacy policy from governing your Personal Information, then this Privacy Policy shall continue to govern. For purposes of this Privacy Policy, "Change In Control" means any of the following events: (i) a reorganization, merger, consolidation, acquisition or other restructuring involving all or substantially all of our voting securities and/or assets, by operation of law or otherwise; (ii) a general assignment for the benefit of creditors; (iii) appointment of a receiver for our business or assets; or (iv) our sale or liquidation, voluntarily or otherwise.

Information We Collect for Sweepstakes, Promotions, Contests & Surveys

On the System, you may wish to participate in online polls, surveys, contests, sweepstakes and other promotions that we may offer from time to time. Participation in these polls, surveys, contests, sweepstakes and promotions is completely voluntary; you have a choice about whether or not to disclose information required to enter. Information requested may include personal contact information such as your name, address, date of birth, phone number, mobile phone number, e-mail address, username, and/or similar information. In addition, as noted above, we may share this information with our affiliates, and other organizations or entities. In connection with any online polls, surveys, contests, sweepstakes and other promotions that we may offer from time to time via the System, we use the information you provide to administer the polls, surveys, contests, sweepstakes and other promotions. Subject to applicable contractual or legal restrictions, we also may use the information to communicate with you, or the other people you select, about our services or our marketing partners may use such information to communicate with you about the online polls, surveys, contests, sweepstakes or other promotions or their products and services.

How We Protect Collected Information

United Capital takes commercially reasonable measures that comply with federal law to secure and protect information transmitted via or stored on the System. These measures include computer safeguards and secured files and buildings. Nevertheless, no security system is impenetrable. We cannot guarantee that information that users of the System may happen to transmit or otherwise supply will be totally secure. You agree to immediately notify us of any breach of System's security, this Privacy Policy, or the Terms of Use of which you become aware.

Linked Websites

For your convenience, some hyperlinks may be posted on the System that link to other websites (the "Linked Websites"). Some Linked Websites are not under our control, such as facebook.com, twitter.com, and linkedin.com. We are not responsible for, and this Privacy Policy does not apply to, the privacy practices of any Linked Websites or of any companies that we do not own or control. Linked Websites may collect additional information to that which we collect on the System. Except for Linked Websites owned or operated by us, we cannot be responsible for the privacy practices of any such Linked Websites, nor do we endorse any of these Linked Websites, the services or products described or offered on such Linked Websites, or any of the content contained on the Linked Websites. We encourage you to seek out and read the privacy policy of each website that you visit. In addition, should you happen to initiate a transaction on a Linked Website, even if you reached that Linked Website through the System, the information that you submit to complete that transaction becomes subject to the privacy practices of the operator of the applicable Linked Website. You should read each Linked Website's privacy policies to understand how Personal Information that is collected about you is used and protected.

California and Delaware "Do Not Track" Disclosures

California and Delaware law require United Capital to indicate whether it honors "Do Not Track" settings in your browser concerning targeted advertising. "Do Not Track" is a standard that is currently under development. As it is not yet finalized, United Capital adheres to the standards set out in this Privacy Policy and does not monitor or follow any Do Not Track browser requests.

Children

The System is not intended for use or view by children under 13 years of age. Consistent with the Children's Online Privacy Protection Act, we will not knowingly collect any information from children under the age of 13. If you are under the age of 13, you must ask your parent or guardian to assist you in using the System. Furthermore, we may restrict entries to any contests, sweepstakes or promotions to entrants who are at least 18 years of age.

Visiting our Websites from Outside of the United States

If you are visiting the System from outside the United States, please be aware that your information may be transferred to, stored or processed in the United States, where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country, but please be assured that we take steps to protect your privacy. By using the System, you understand and consent that your information may be transferred to our facilities and those third parties with whom we share it as described in this privacy policy.

Unsubscribe/ Contact Us

We want to communicate with you only if you want to hear from us. If you prefer not to receive information from us or would like to update or change your personal information or preferences, please follow the instructions below. However, we may send you service-related announcements, announcements about changes in policies, and transactional e-mail such as confirmations and receipts, from time to time through the general operation of the System or by e-mail. If you do not want to receive any e-mail from us in the future, click the "unsubscribe" reference in any e-mail we send you.

If you wish to review the contact information we have on file for you, correct your contact information, provide a change of address, or inform us how you wish your contact information to be used, or if you have any questions, comments or suggestions about the System, our Services, United Capital please contact us by mail, telephone, or e-mail, as follows:

finlife.support@unitedcp.com

1(800) 796-3315

Hours of Operation: 7:00 A.M. to 7:00 P.M. CT

620 Newport Center Drive
Suite 500
Newport Beach, CA 92660

If you correspond with United Capital through the System or via email, the Collected Information may include the content of, and metadata regarding, any correspondence you may have with us. We may share your messages with those within our organization who are most capable of addressing the issues contained in your message. We will keep a copy of your message until we have had an opportunity to address your concerns.

Acknowledgement

BY ACCESSING OR USING THE SYSTEM, OR ANY PORTION THEREOF, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND CONSENT TO THE PRIVACY POLICY, AND TO THE USES AND DISCLOSURES OF COLLECTED INFORMATION ABOUT YOU, THAT ARE DESCRIBED IN THIS PRIVACY POLICY AND YOU AGREE TO BE BOUND BY THE TERMS OF USE REFERENCED ABOVE.

This Privacy Policy was last updated on August 1, 2016.