

This Privacy Policy is provided to you on behalf of H.D. Vest, Inc. d/b/a HD Vest Financial Services and its affiliates H.D. Vest Investment Securities, Inc., H.D. Vest Advisory Services, Inc., H.D. Vest Insurance Agency, LLC (collectively, "HD Vest" or "we" or "us" or "our"). This policy applies to consumers who have or had established a customer relationship with HD Vest through its BluVest investment advisory program. For purposes of this policy, "Personal Information" is data specifically about you, which you typically provide to HD Vest on a voluntary basis when you purchase products or services through us. Personal Information does not include publically available information or anonymous, aggregate or combined information, which includes data related to you but does not identify you specifically.

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 HD Vest to tell you how we collect, share, and protect your Personal Information. The types of Personal Information we collect and share depends on the product or service you obtain through us. State laws may give you additional rights to limit sharing. See below for information on your rights under state law.

### **Information Collection**

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HD Vest collects and maintains certain information about you, including Personal Information, in connection with opening and servicing your account, offering you products and services, and complying with applicable supervisory and record keeping regulatory requirements. In the course of serving you, we collect certain Personal Information about you from a variety of sources, such as:

- **Information you voluntarily provide to us through electronic communications (including email), on applications or forms, and through our websites, including, but not limited to,** your name, address, Social Security number, birth date, assets, income, email address, and/or health information (if you apply for insurance products through HD Vest). We may also collect information from your tax return if you voluntarily agree with your tax preparer (e.g., TaxAct, Inc.) to share that information with us;
- **Information we receive from an outside company,** such as a credit bureau regarding your credit history if you apply for credit products, or due diligence companies to confirm your identity, background and/or eligibility to open an account; or
- **Information about your transactions or communications** with HD Vest, including electronic communications you have with HD Vest.

### **Information Use and Disclosure**

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#### ***How we use and share information about you within HD Vest***

The Personal Information we collect is used to maintain and service your accounts. You cannot limit the sharing of Personal Information in this category. Personal Information may be used or shared within HD Vest for a number of purposes, such as:

- **For our everyday business purposes** such as to process your transactions, maintain and service your account, provide you with customer service, and protect your account; and
- **For marketing purposes** to offer products and services to you.

#### ***How we share information about you with Affiliates***

The Personal Information we collect may be shared with companies under common ownership and control with HD Vest including non-financial companies, such as TaxAct, Inc. ("HD Vest Affiliates"). Under federal law, you cannot limit sharing of information in this category, as described below.

- **To perform services for us or to assist us in servicing your account; and**
- Sharing information based solely on your transactions with HD Vest so that HD Vest Affiliates may offer products and services to you?

#### ***How we share information about you with Nonaffiliates***

We share Personal Information with nonaffiliates in connection with servicing your account or otherwise as permitted or required by law. You cannot limit the sharing of Personal Information for the purposes described below.

- **Companies that perform services for us or assist us in servicing your account.** For example, First Clearing, LLC (HD Vest's clearing firm), TD Ameritrade (H.D. Vest Advisory Services, Inc.'s clearing firm for its BluVest investment advisory program), data processors, technical systems consultants and computer programmers, check printers, data aggregators, marketers, mail fulfillment vendors and insurance policy underwriting, administration, and claims handling;
- **Others as permitted or required by law.** For example, responding to court orders, subpoenas, regulatory inquiries and legal investigations, reporting to credit bureaus, and those with whom you have requested or

authorized us to share information;

- **In connection with an acquisition, merger, restructuring, sale or other transfer** of all or any portion of HD Vest, we may share Personal Information with the purchaser or potential purchaser; and
- HD Vest does not sell your Personal Information to nonaffiliates for those companies to market their own products or services to you.

### **Information You Share With Others**

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Account owners may choose to share their Personal Information or account-related information with individuals who are not account owners. For accounts held jointly by two or more persons, the privacy choices made by any account holder apply to everyone on your account. This applies, but is not limited to, Personal Information and account-related information provided to an account owner in paper or electronic formats.

### **Information Protection**

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To protect your personal information from unauthorized access and use, we use security measures designed to comply with federal law. These measures include computer safeguards and secured files and buildings. Additionally, HD Vest requires its employees to comply with its privacy standards and policies, which are designed to protect customer information.

HD Vest has also established a separate Online Privacy Policy governing the collection of information obtained through the HD Vest websites. For further information, please visit the page [HD Vest Online & Mobile Privacy Policy](#) available on [www.BluVest.com](http://www.BluVest.com).

### **Information For California and Vermont Customers**

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If the mailing address provided for your account is in California, you may opt out of HD Vest disclosing your Personal Information to HD Vest Affiliates for purposes of them marketing to you, by clicking [opt-out@bluvest.com](mailto:opt-out@bluvest.com).

If the mailing address provided for your account is in Vermont, we will automatically treat your account as if you do not want us to disclose your Personal Information to HD Vest Affiliates for purposes of them marketing to you.

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6333 N. State Highway 161, Fourth Floor, Irving, TX 75038, (972) 870-6000 1501163 01/17



## **HD Vest Online & Mobile Privacy Policy**

This policy is effective as of January 30, 2017

### **Scope and Overview of Policy**

This Online and Mobile Privacy Policy ("Policy") applies to your interaction with H.D. Vest, Inc. d/b/a HD Vest Financial Services® and the family of HD Vest companies (collectively, "HD Vest"), through the BluVest online or mobile site or application ("Sites"). Other privacy policies may also apply in addition to the terms of this Policy. As examples, certain additional HD Vest privacy-related policies and notices are posted on the "Privacy" section of <https://www.bluvest.com/>. These include the HD Vest Privacy Policy for Individuals, which applies when you apply for services from HD Vest through the Sites. Please note that where we have a presence on a site owned by a third party, such as a page or account on a social media site, this Policy shall govern the collection of information and data by HD Vest through the Sites and that third party's privacy policy and terms of use will govern the collection and use of data by that third party.

For purposes of this Privacy Policy, "Personal Information" is data specifically about you, which personally identifies you, and which you typically provide on a voluntary basis. Personal Information does not include aggregate or combined information, or Automated Data (as defined below), which is data related to you but does not identify you specifically. By using the Sites or related services, you consent to HD Vest's collection, use and sharing of the data as described in this Privacy Policy.

### **Personal Information We Collect**

When you request information by completing one of the available on-line request pages (such as "Contact HD Vest", "How can I get started," etc.), we may collect Personal Information, including your name, address, telephone number, email address, other means to contact you. When you register for and/or use an online service on the Sites, the Sites may collect or receive from third parties contact information, and additional information, such as your account number, social security number, financial information (including statements, account balances, and transaction history) submitted by you or others in connection with your use of the Sites, and verification information that we use to identify you.

### **Our Use and Sharing of Personal Information**

Information we collect through the Sites, including Personal Information, may be used and shared in any manner described in HD Vests Privacy Policy for Individuals, including to: (i) contact you regarding a request for information that you made; (ii) perform certain tasks and provide services that you requested (for example, correspond with us or review your accounts); (iii) verify your identity when accessing the Sites; (iv) enforce our Terms of Use and any other agreements between you and HD Vest; (v) improve, modify, customize, and measure HD Vest online services; (vi) compare information for accuracy and verify our records; (vii) detect and prevent fraud or other criminal activities; and (viii) market services to you.

In connection with these Uses of Personal Information, HD Vest may share Personal Information among its affiliates and with HD Vest Advisors. HD Vest will not share personal information collected through the Sites with non-affiliates without your express authorization except: (i) companies that perform services for us or assist us in servicing your account; (ii) as permitted or required by law; and (iii) in connection with an acquisition, merger, restructuring, sale or other transfer involving all or any portion of HD Vest.

### **Our Collection and Use of Automated Data, Including Cookies and Similar Technology**

In addition to the information you provide, HD Vest may also automatically collect information about your computer or your activity ("Automatic Data"). For example, we may record how many times you click on a hyperlink, determine whether you visited the Sites from a particular Internet link or advertisement, or track your path through the Sites. This automatic data collection may include but may not be limited to information collected by cookies, IP addresses, log data, browser data, and transparent GIFs.

Cookies are pieces of data stored on your device and are assigned by a web server to the browser on your device. When you return to a site you have visited before, your browser gives this data back to the server.

A "session cookie" may be sent to your computer or other access device when you log in to the Sites. This type of cookie recognizes you if you visit multiple pages on a site during the same session, so that you do not need to be prompted for your password on each page. Once you log out or close your browser, this cookie expires and no longer has any effect. "Persistent" or longer-lasting cookies can be used for other purposes, such as to record user experience preferences when you use a website. These cookies do not expire once you log out or close your browser. You are free to decline

cookies if your browser permits, but doing so may interfere with your use of the Sites.

We and our third party service providers may also use technologies similar to cookies to track your interaction with the Sites and to serve advertising that is relevant to users. Some of these technologies may include web beacons, pixels, tags and Flash objects. As with cookies, you are free to decline such technologies if your browser permits. You should refer to your browser's instructions to remove cached history and images from your device. Deleting or disabling cookies will not remove Flash objects. You should refer to Adobe's website ([www.adobe.com](http://www.adobe.com)) for more information on how to disable these objects.

Some third parties' data collection tools or embedded content, plugins or other technology on the Service, such as cookies or social media sharing buttons, may allow their operators to learn about your interaction with our Service, and they may combine this information with other, identifiable information they have collected about your visits to other websites or online services. These third parties may handle this information, and other information they directly collect through their technology, pursuant to their own privacy policies or practices. You may visit the Network Advertising Initiative's Consumer Opt-Out Link (<http://www.networkadvertising.org/choices/>), the European Interactive Digital Advertising Alliance "Your Online Choices" page (<http://www.youronlinechoices.eu/>) or the Digital Advertising Alliance's Consumer Opt-Out Link (<http://www.aboutads.info/choices/>) to opt out of receiving tailored advertising based on your Internet browsing activities from companies that participate in those programs. Some of our advertising-related activities may involve the services of companies that do not participate in those programs. To opt out of Google Analytics for Display Advertising or customize Google Display Network ads, you can visit the Google Ads Settings page (<https://www.google.com/settings/u/0/ads/authenticated?hl=en>).

We do not change our own collection of information in response to web browser "do-not-track" signals or other third-party tools that let consumers exercise choice regarding the collection of personally identifiable information. Also, we generally do not require third parties collecting information on our Sites and online services to respond to these technologies.

HD Vest may aggregate the Automatic Data it collects from its various users (which does not include your Personal Information) and share it with or sell it to HD Vest's affiliates, business partners, and other third parties. The Automatic Data may be used by HD Vest or the third parties for research purposes (including to help HD Vest improve its products), among other uses.

### **Protecting Children's Privacy Online**

We do not seek to nor knowingly collect or use Personal Information from children under 13 on the Sites. No part of the Sites is structured to attract anyone under 13. If a child has provided us with Personal Information, a parent or guardian of that child may contact us to have the information deleted from our records. To do so, contact HD Vest through the information provided in the "Contact Us" section below.

For more information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website: [www.ftc.gov](http://www.ftc.gov).

### **Links to non-HD Vest websites**

The Sites may contain links to websites controlled or offered by third parties (i.e., non-affiliates of HD Vest). HD Vest hereby disclaims liability for any other company's website content, products, privacy policies, or security. In the event you choose to use the services available at a linked website, you agree to read and adhere to the policies and terms of use applicable to that website. In addition, any advice, opinions, or recommendations provided by the linked website are those of the website's providers and not of HD Vest. Your participation in any linked website, including payment for and the delivery of goods or services, is based solely on the agreement, if any, between you the linked website's provider. The fact that HD Vest has provided a link to such websites is not to be interpreted as an endorsement of their content.

### **Services Offered through HD Vest Advisors**

HD Vest Advisors are independent contractors affiliated with HD Vest solely for the purpose of conducting securities-related activities offered through HD Vest. If your HD Vest Advisor offers you other products or services not affiliated with HD Vest (e.g., legal, tax, accounting, audit, payroll), then any Personal Information you provide unrelated to HD Vest products and services is not covered by this privacy policy and your rights (including the right to limit what the Advisor retains after leaving HD Vest) would instead be governed by the laws and rules covering that particular product or service and the Advisor's independent business privacy policy. HD Vest does not have control over the privacy practices of its

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independent advisors' services that are not affiliated with HD Vest. Please consult with your HD Vest Advisor regarding his or her practices with regard to your information.

**Online Privacy Policy changes**

Your use of the Sites constitutes your acceptance of the terms and conditions in this Privacy Policy, as modified from time to time, as well as our User Agreement (see the disclosure section of <https://www.bluest.com/>). If it is necessary to make changes to our online privacy policies, we will update this Privacy Policy with the changes and new effective date. HD Vest may, but is under no obligation to, provide you notice of such modifications to this Privacy Policy via email or other communication, unless HD Vest materially changes its policies with respect to the sharing of your Personal Information with non-affiliated third parties. Your continued use of the Sites following the posting of changes to this Privacy Policy, and/or other notice of changes, means that you accept the changes and our use of your Personal Information in accordance with the revised policy.

**Opting Out**

You cannot opt out of receiving required administrative or legal communications.

**California Residents: Your California Privacy Rights**

If you are a California resident, you may have the right to request and receive certain information about our disclosure of your Personal Information to third parties for their direct marketing purposes, and your choices with respect to such disclosures. Because it is our policy not to share your Personal Information with unaffiliated third parties for marketing direct purposes unless you are first given the opportunity to opt-out or opt-in from such sharing, this requirement is not applicable to us. If you still wish to learn more about our compliance with this requirement, please contact us using the information provided in the "Contact Us" section below.

**Contact Us**

For questions regarding this Privacy Policy, please contact HD Vest at:

**By Postal Mail:**

6333 North State Highway 161 Suite 400  
Attn: Risk Management  
Irving, Texas 75038

**By Phone:**

Call HD Vest at (866) 218-8206, option 2, and ask for Risk Management.