

Vesto Financial, Inc. Privacy Policy

Last modified: September 7, 2022

Introduction

Vesto Financial, Inc. (“**Vesto**”, “**We**”, “**Our**”, “**Us**”) respect your privacy and are committed to protecting it through Our compliance with this policy (the “**Privacy Policy**”).

This Privacy Policy describes the types of information We may collect from you or that you may provide when you:

- Visit the website <https://getvesto.com/> (our “**Website**”) and Our practices for collecting, using, maintaining, protecting, and disclosing that information.
- Use any of Vesto’s investment advisory services or other finance tips and recommendations (the “**Products**”), which are accessible on the Website.

This Privacy Policy applies to information We collect:

- On the Website.
- In email, text, and other electronic messages between you and the Website.
- Through mobile and desktop applications you download from the Website, which provide dedicated non-browser-based interaction between you and the Website.
- When you interact with Our advertising and applications on third-party websites and services, if those applications or advertising include links to this Privacy Policy.

This Privacy Policy does not apply to information collected by:

- Us, offline or through any other means, including on any other website operated by Vesto or any third party including Our affiliates and subsidiaries; or
- Any third party, including Our affiliates and subsidiaries, including through any application or content (including advertising) that may link to or be accessible from [or on] the Website.

Please read this Privacy Policy carefully to understand Our policies and practices regarding your information and how We will treat it. If you do not agree with Our policies and practices, your choice is not to use Our Website. By accessing or using the Website, you agree to this Privacy Policy. This Privacy Policy may change from time to time (see Changes to Our Privacy Policy below). Your continued use of the Website after We make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

This Privacy Policy applies to visitors to the Website, including those that view only publicly available content and subscribers who have signed up to the access and use the Products offered by Vesto through the Website. By signing up, accessing, or using Vesto’s Website, you agree to the terms of this Privacy Policy, the Terms and Conditions of Use, and any other applicable agreements.

Individuals Under the Age of 18

Our Website is not intended for individuals under 18 years of age. No one under age 18 may provide any personal information to the Website. We do not knowingly collect personal information from individuals under 18. If you are under 18, do not use or provide any information on the Website or through any of its features, register on the Website, make any purchases through the Website, use any of the interactive or

public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If We learn We have collected or received personal information from an individual under 18 without verification of parental or legal custodian consent, We will delete that information. If you believe We might have any information from or about an individual under 18, please contact Us and We will endeavor to delete that information from Our databases.

Information We Collect About You and How We Collect It

In the course of operating the Website and providing the Products, We collect or receive the following types of information:

1. Personal Information

When you register to become a Client, you will be asked to provide Us with certain information about you, such as, your name, date of birth, Tax ID number, citizenship, visa information, home address, telephone number, email address, bank account number, bank routing number, bank account login credentials, bank name, employer name, employment status, job position, whether you are a “politically exposed person,” whether you are a “control person” (pursuant to FINRA Rule 3210), annual income range, total net worth range, and other information as appropriate for Our legitimate business needs (collectively and together with information referenced in Sections 2 through 6 below, the “Personal Information”). We may also collect Personal Information when you voluntarily provide Us with Personal Information as a Visitor.

2. Nonpublic Personal Information

When you register to become a Client and at certain times following initial registration during the provision of Our Website to you, We will also collect your nonpublic personal information which means (i) any information you provide to Us to obtain a financial product or service from us, (ii) any information about you resulting from any transaction involving a financial product or service between Us and you, or (iii) any information We otherwise obtain about you in connection with providing a financial product or service to you (“Nonpublic Personal Information” or “NPI”). NPI is a subset of Personal Information and shall be considered Personal Information under this Privacy Policy. We may also collect Nonpublic Personal Information from Visitors, who are consumers of Our Website.

3. Initial Questionnaire Information

When you register as a Client, you will be asked to provide information about yourself such as, your name, age, etc., (collectively, the “Initial Questionnaire Information”). Initial Questionnaire Information may be updated or modified following initial registration during the provision of Our Website to you. Initial Questionnaire Information is a subset of Personal Information and shall be considered Personal Information under this Privacy Policy.

4. Card and Bank Information

Certain features of the Website will allow you to link your bank account(s), credit card, and debit card to your Vesto account(s) by providing your account number, billing address and similar information (collectively, the “Card and Bank Information”). Card and Bank Information may be collected and processed by one or more third parties pursuant to the terms and conditions of their respective privacy policies and terms of use. Card and Bank Information is a subset of Personal Information and shall be considered Personal Information under this Privacy Policy. To the extent that the Vesto stores your Card and Bank Information and uses it as set forth in this Privacy Policy.

5. Transaction Information

When Clients wish to make a purchase, sale or any other transaction through the Website, they must provide Us with certain information about the transaction they are seeking to execute. Such information is

collectively called the “Transaction Information.” Transaction Information is a subset of Personal Information and shall be considered Personal Information under this Privacy Policy.

6. Geolocational Information

Certain features and functionalities of the Website may be based on your location. In order to provide these features and functionalities while you are using a mobile device, We may, with your consent, automatically collect geolocation information from your mobile device, wireless carrier, or certain third-party service providers. Such information is collectively called the “Geolocational Information.” Collection of such Geolocational Information occurs only when the App is running on your mobile device. You may decline to allow Us to collect such Geolocational Information, in which case Vesto will not be able to provide certain features or functionalities to you.

7. Other Information.

We may automatically collect or receive additional information about you, your use of Our Website, your interactions with Us and Our advertising, as well as information regarding your computer or other devices used to access Our Website (collectively, the “Other Information”). Such Other Information may include, but is not limited to, the following:

A. From Your Activity

- IP address, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device;
- Browser type and language;
- Referring and exit pages and URLs;
- Date and time; and
- Details regarding your activity on the Website, such as search queries and other performance and usage data.

B. About Your Device

- Type of device;
- Universally Unique Identifier (“UUID”);
- Advertising Identifier (“IDFA” or “AdID”);
- Operating system and version (e.g., iOS, Android or Windows);
- Wireless carrier; and
- Network type (WiFi, 3G, 4G, or LTE).

Surveys

We may, from time to time, ask you to participate in surveys on Our Website. Participation in these surveys is completely voluntary. These surveys may be conducted by Our third-party service providers. Such third-party service providers are authorized to use your information only as necessary to provide these services to us. We will use survey results to continue to improve the Website and the Products. We will use your personal information from Our surveys to send you information about Our products and services and about third-party products and services. We may combine your survey information with other data We have about you. We may also anonymize and aggregate the survey information and sell it to third parties.

Information Collected by or Received from Third-Party Sources

We may also collect Personal Information and information about your transactions with Us and those you engage in with Our affiliates, unaffiliated third parties, banking verification services and information from consumer reporting agencies. We may further collect information about you from third-party data sources, such as brokers, banks and government databases. We may combine data We collect about you from

third-party data sources with data We collect from you and may use and share such data as described in this Privacy Policy. All information We collect and/or receive from such third-party sources is collectively referred to as “Third-Party Information.”

The technologies We use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of Our Website. Unless you have adjusted your browser setting so that it will refuse cookies, Our system will issue cookies when you direct your browser to Our Website.
- **Flash Cookies.** Certain features of Our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on Our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see Choices About How We Use and Disclose Your Information.
- **Web Beacons.** Pages of Our the Website [and Our e-mails] may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit Vesto, for example, to count users who have visited those pages or [opened an email] and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Information Collected by or Through Third-Party Advertising

We may share Other Information about you with third parties that Vesto has selected and approved for advertisement distribution and advertisement optimization (defined as the tailoring, targeting (i.e., behavioral, contextual, and retargeting), analyzing, managing, reporting, and optimizing of ads). These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and other technologies to collect Other Information for such purposes. Pixel tags enable Us and these third-party advertising companies to recognize a browser’s cookie when a browser visits the Website on which the pixel tag is located in order to learn which advertisement brings a user to a given Service. In addition, We may receive Other Information from advertisers and/or their service providers such as advertising identifiers, IP addresses, and post-conversion data. You may choose to opt-out of this type of tracking and sharing of information at any time by selecting the specific partners you wish to exclude from these websites: <http://www.aboutads.info/choices> and <http://optout.networkadvertising.org/>.

How the Information is Used and Shared

You authorize Us to use the Personal Information, the Third-Party Information, and the Other Information (collectively, the “Information”) to provide and improve Our Website and Products; to help Us improve the content and functionality of Our Website and Products; to provide trade recommendations; to advise you about your portfolio; to solicit your feedback; and to inform you about Our products and services and those of third parties.

You also authorize Us to use and/or share Information as described below.

- We will access, use, and share the Information as required to fulfill Our contractual obligations to you or subsequent requests for support by you;

- To track your purchases, match your purchases with the Other Information We have about you and provide suggestions to you about potential product recommendations, services recommendations, trade recommendations, saving money, and other financial services and offers that We believe may help you;
- Vesto, like many businesses, sometimes hires other companies to perform certain business-related functions on Our behalf. Examples of such functions include website hosting, mailing information, maintaining databases, ID verification, processing applications, processing payments and completing transactions. When We employ another company to perform a function of this nature, We only provide it with the information that it needs to perform its specific function. These companies are authorized to use your Information only as necessary to provide these services to us;
- We may share some or all of your Information with any other companies that We control, are controlled by, or are under common control with us;
- As We develop Our businesses, We might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, launch of a new subsidiary, dissolution, or similar event, the Information may be part of the transferred assets and you will be notified via email and/or a prominent notice on Our Website of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information;
- In an ongoing effort to better understand Our Clients, the Website, and the Products of Vesto, We may analyze certain Information to compile information about Our Client demographics, interests and behaviors and to create data analytics on an aggregate basis. This aggregate information does not identify you personally. We may share this aggregate information with Our affiliates, agents, business partners, and other third parties. We may also disclose aggregated user statistics in order to describe the Website, the Website and Our products and services to current and prospective business partners and investors and to other third parties for other lawful purposes;
- Vesto may disclose your Information if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of Vesto, (iii) act in urgent circumstances to protect the financial security of users of the Website or the public against fraud or other harm, or (iv) protect against legal liability;
- Vesto may from time to time enter into agreements with third parties, such as employers or affiliate membership groups, pursuant to which the third-party may pay a portion or all of fees of its employees or members, and may on occasion make direct or indirect contributions to Vesto account of its employees or members. This is generally implemented by distributed "promotional codes" that are sponsored by the employer or affiliate membership group. If you use the benefit provided by an employer or affiliate group, you consent to additional anonymized reporting with respect to the participation, contribution rates, engagement, etc., of the employees or members, and consent to personalized reporting (i.e., where you may be specifically identified) solely and exclusively to (x) confirm your use of Vesto to your employer or affiliate membership group, and (y) if the employer or affiliate membership group makes a contribution to your Vesto account, to confirm receipt of the specific amounts contributed. In addition, if the benefit the employer or affiliate group provides includes embedding the Vesto experience in a broader experience hosted by the employer or affiliate, by using such benefit you consent to Vesto embedding the Vesto experience in the hosted experience, and understand that your Personal Information may be shared in order to implement the hosted experience; and

- We may share your Information with third parties, including but not limited to third-party market research firms for analysis purposes and to help such third parties generate market research data for Us which will not identify you personally. Such third parties will provide Us market research data to help Us better segment Our Client base and understand what products and services would likely work best for Our Clients.

If you would like to opt-out of the Vesto's sharing of your Information with affiliates and third parties for marketing purposes, please contact Us at contact@getvesto.com. We will use your Information for Our internal business purposes, including but not limited to, creating user state modeling and comprehensive behavioral profiling.

If Vesto intends on using your Personal Information in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time at which the Personal Information is collected.

Sharing of Your Information with Non-affiliated Third Parties

We will not share your Information with non-affiliated third parties that may use your Information to market to you, without obtaining your opt-in consent. For example, We may offer you with a product opportunity that requires Us to share your Information with non-affiliated third parties that may use your Information to market to you. We will obtain your opt-in consent to such sharing of your Information when We present you with the terms of such offer.

If you have opted-in for this kind of sharing of your Information, then you may: (i) choose to opt-out of such sharing by contacting Us at contact@getvesto.com; or (ii) request certain information regarding Our disclosure of your Information to such non-affiliated third parties by contacting Us at contact@getvesto.com.

Accessing and Modifying Information Communication Preferences

If you have provided Us any Personal Information, you may access, remove, review, and/or make changes, by making the change(s) in your registered account settings page. If you experience difficulties, please contact customer support at contact@getvesto.com. We will respond to your request as soon as possible. Please note that customer service is not able to make changes on your account.

Communication Preferences.

When you sign up for Our Website, We will send periodic emails to you regarding the Website or to tell you about services We believe will be of interest to you.

If at any time you wish not to receive any future newsletters or marketing communications or you wish to have your name deleted from our mailing lists, please follow the unsubscribe instructions included in these emails or contact Us at contact@getvesto.com. We will use commercially reasonable efforts to process such requests in a timely manner. Note, however, that as a user of the Website, We, and/or Our custodian(s), will send you administrative and transactional communications that are reasonably necessary to provide the Website, such as billing, brokerage or service notifications and you cannot opt out of receiving such communications.

If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other Website users.

Proper access and use of information provided on the Website, including User Contributions, is governed by our terms of use.

How We Protect Your Information

The security of your information is important to us. When you enter sensitive information (such as bank account information) in Our Website, We encrypt the transmission of that information using secure socket layer technology (SSL). We and Our custodian also use third-party ID verification to ensure Our users' true identities are validated.

We take commercially reasonable technical, administrative, and physical safeguards to protect information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of Our databases or the databases of the third parties with which We may share such information, nor can We guarantee that the information you supply will not be intercepted while being transmitted over the Internet. In particular, email sent to Us may not be secure, and you should therefore take special care in deciding what information you send to Us via email. If you have any questions about security on Our website, you can contact Us at contact@getvesto.com.

Exclusions

This Privacy Policy does not apply to any Personal Information collected by Vesto other than Personal Information collected through the Website and/or Products. This Privacy Policy shall not apply to any unsolicited information you provide to Vesto through the Website, or through any other means. This includes, but is not limited to, information posted to any public areas of the Website, any ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, "Unsolicited Information"). All Unsolicited Information shall be deemed to be non-confidential and Vesto shall be free to reproduce, use, disclose, distribute and exploit such Unsolicited Information without limitation or attribution.

Suspicious Email

We do not email you or send you other electronic communications to request nonpublic information or account information (such as username and password). If you receive an unsolicited email or other electronic communication that appears to be from Vesto but you suspect it may be from some other source or fraudulent, please email Us at contact@getvesto.com.

Changes to Vesto's Privacy Policy

Vesto may update this Privacy Policy to reflect changes to Our information practices. If Vesto makes any material changes to this Privacy Policy Vesto will notify you via email (sent to the email address specified in your user account) or by means of a notice on the Website prior to the change becoming effective. By visiting and/or using the Website after Vesto implements such changes to this Privacy Policy, you are deemed to have accepted such changes. Please take notice that, to the extent permitted by applicable law, Vesto's use of the Personal Information is governed by the Privacy Policy in effect at the time Vesto collects such information. Vesto encourages you to periodically review the Privacy Policy for the latest information on Vesto's privacy practices.

Federal Privacy Notice

Vesto is required by federal law to provide consumers with information regarding Our collection and sharing of nonpublic personal information. Please see Our Privacy Notice for more information.

Geographical Notices

The Website and Products are intended for natural persons who are citizens or other lawful residents of the United States and who are located in the United States. The Website, the Products and their servers are controlled and operated in the United States. Please take notice that your Personal Information may

be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, country, or other governmental jurisdiction where the privacy laws may not be as protective as in your country of origin. If you are located outside the United States and choose to use the Website and/or the Products, you do so at your own risk.

Contact Information

To ask questions or comment about the Privacy Policy and Vesto's privacy practices, contact Vesto at:

511 West 25th Street, New York, New York, 10001, via email at contact@getvesto.com or via Our toll-free number: (856)-219-4026.

To register a complaint or concern, please contact Vesto at: 511 West 25th Street, New York, New York, 10001, or via email at contact@getvesto.com or via Our toll-free number: (856)-219-4026.