

Matson Money, Inc.

PRIVACY POLICY

How Matson Money, Inc. (“Matson Money”) protects Account Owners’ (“Account Owner”) personal information:

Matson Money, Inc., takes precautions—including administrative, technical, and physical measures—to safeguard personal information against loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction. We restrict access to Account Owners’ personally identifiable financial information (“Nonpublic Personal Information”) to employees who need to know that information in order to provide services to Account Owner. Matson Money also maintains physical, electronic, and procedural safeguards to protect Account Owners’ non public personal information.

Integrity of Account Owners’ personal information:

Matson Money has safeguards in place to keep Account Owners’ information complete and up to date. Matson Money has proprietary software that provides the tools to review and update Account Owner information. No other software used at Matson Money can affect the Account Owner’s account information. This software logs every change made to an account so that it has a paper trail for tracking and accountability. Only a select group of people have the ability to alter Account Owners’ data. Website access is strictly read-only; no changes can be made via the website.

Technologies:

The Matson Money website that Account Owners may access, <http://www.MatsonMoney.com>, is a forced SSL site (meaning all traffic is encrypted) that does not allow saving of login information. Matson Money requests the username and password upon each login. Matson Money maintains an integral difference between what is contained in the database and what Account Owner and Authorized Representatives can access. Full database backups are performed every night. These backups are rotated on an abbreviated GFS scheme; translating into 6 tapes for daily backups, 2 tapes for weekly backups, and 1 tape for monthly backup. This is an industry standard approach modified for limited archival retrieve based on our constantly changing data. Backups are encrypted on both disk and tape using 168-bit encryption.

Company-wide commitment to privacy of Account Owners:

Matson Money does not sell Account Owners’ personal information to anyone. Matson Money collects Nonpublic Personal Information from Account Owners from the following sources:

- Account applications and other forms, which may include an Account Owner’s name, address, social security number, and information about the Account Owner’s investment goals and risk tolerance.
- An Account Owner’s professional advisors, such as an Account Owner’s broker, financial planner, attorney, or accountant (an “Authorized Representative”), who may provide financial or investment history and tax information about the Account Owner.
- History of account(s), including information about the transactions Matson Money has ordered for Account Owner and balances in Account Owner’s account(s).
- Correspondence, written or telephonic, between Account Owner and Matson Money or Account Owner’s Authorized Representative, or custodian and Matson Money.

Matson Money does not disclose any Nonpublic Personal Information about Account Owner to any entity that is not an affiliate of, or related by common ownership or affiliated by corporate control (“Unaffiliated Third Party”) with, Matson Money except as permitted or required by law. Accordingly, Matson Money may disclose all of the information Matson Money collects about the Account Owner or the Account Owner’s account(s), as described above, under the following circumstances:

- Matson Money receives an Account Owner’s prior consent.
- Matson Money believes the recipient to be an Account Owner’s Authorized Representative.
- The recipient is an Authorized Representative, custodian, or other service provider with whom we must share information in order to manage or service an Account Owner’s account properly.
- The recipient is an Unaffiliated Third Party that performs marketing services on Matson Money’s behalf, and
- Matson Money is required by law to release the information to the recipient.

Matson Money will only use information about Account Owner and Account Owner’s account(s) to:

- To service Account Owner’s investment and financial needs.
- Manage and service Account Owner’s account(s).
- Administer Matson Money’s business.

Matson Money will adhere to the policies and practices described in this policy whether Account Owner is a current or non-current Account Owner of Matson Money.

Matson Money will not directly contact Account Owner to ask for Nonpublic Personal Information for Account(s).

- Any request or verification of Nonpublic Personal Information will be directed to an Authorized Representative.
- If Nonpublic Personal Information is requested by someone other than an Authorized Representative, Matson Money will verify social security number and date of birth of Account Owner prior to release of said information. This type of request would occur in the event Account Owner closes account(s) and assets are being transferred to a new investment firm.

Matson Money, Inc.

PRIVACY NOTICE

FACTS

WHAT DOES MATSON MONEY 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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include</p> <ul style="list-style-type: none"> • Social Security number and income • Account balances and payment history • Credit history and credit scores <p>When you close your account, we continue to share information about you according to our policies.</p>
How?	All financial companies need to share customers' personal information to run their everyday business—to process transactions, maintain customer account, and report to credit bureaus. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Matson Money chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Matson Money Share?	Can you limit this sharing?
For our everyday business purposes: to process your transactions, maintain your account, and report to credit bureaus	Yes	No
For our marketing purposes: to offer our products and services to you	No	We don't share
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes: information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes: information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For non-affiliates to market to you	No	We don't share

Contact Us	www.MatsonMoney.com
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Sharing Practices

How often does Matson Money notify me about their practices?	We must notify you about our sharing practices when you open an account and each year while you are an Account Owner.
How does Matson Money 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 Matson Money collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none">• Open an account or deposit money
Why can't I limit all sharing?	Federal law gives you the right to limit sharing only for <ul style="list-style-type: none">• Affiliates' everyday business purposes—information about your creditworthiness• Affiliates to market to you• Non-affiliates to market to you State laws and individual companies may give you additional rights to limit sharing.

Definitions

Everyday business purposes	The actions necessary by financial companies to run their business and manage Account Owner accounts, such as <ul style="list-style-type: none">• Processing transactions, mailing, and audited services• Responding to court orders and legal investigations
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none">• Our affiliates include Matson Money, Inc. and McGriff Video Production, LLC.
Non-affiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none">• Matson Money does not share with non-affiliates so they can market to you.
Joint marketing	A formal agreement between non-affiliated financial companies that together, market financial products or services to you. <ul style="list-style-type: none">• Matson Money doesn't jointly market.