

# Cboe Vest- Privacy Notice and Policy

Last Updated: August 28, 2019

Cboe Vest Financial LLC (along with Cboe Vest Group Inc. and affiliated companies, collectively “Cboe Vest”) has created this Privacy Notice and Policy in order to demonstrate our firm commitment to the privacy of a) users of a Cboe Vest World Wide Website (“Cboe Vest Website”); b) Cboe Vest customers and prospective customers; c) Cboe Vest participants, members, users and such persons’ associated persons and representatives; and d) any other individuals from whom Cboe Vest collects personal data during the course of its business activities. This Privacy Notice and Policy describes the personal data collected by Cboe Vest, how Cboe Vest uses your personal data, with whom we may share such data and how you can contact Cboe Vest, access your personal data and exercise your rights regarding Cboe Vest’s use of your personal data. By using or accessing a Cboe Vest Website, you signify your acknowledgment and assent to this Privacy Notice and Policy.

## Data Collection and Dissemination

Except as otherwise provided in this Privacy Notice and Policy, the following discloses our data gathering and dissemination practices.

Cboe Vest values your privacy and processes your personal data, as a data controller, in accordance with applicable data protection laws, including the EU General Data Protection Regulation (“GDPR”). Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

Cboe Vest processes your personal data for certain legitimate business purposes/interests which may include some or all of the following:

- To administer and manage our relationship with you
- To evaluate, review, approve, or enter into potential contractual arrangements
- To enable us to enhance, modify, personalize or otherwise improve our services/ communications for the benefit of users
- To keep you informed about our activities, products and services that we think may be of interest to you, as permitted by applicable law
- To enhance the security of our network and information systems
- To better understand how people interact with Cboe Vest Websites
- To comply with certain obligations under applicable law, industry guidelines and internal policies
- To manage, administer and assign transactions that are effected on Cboe Vest facilities
- To determine the effectiveness of promotional campaigns and advertising

Use of a Cboe Vest Website may involve the collection of personal data by Cboe Vest. There are also cases where users may be asked for personal data on a Cboe Vest Website. For example, online surveys are occasionally conducted to better understand the needs and profiles of Cboe Vest Website users. Our online surveys typically ask users for demographic and profile data such as zip code, age, and income level. In addition, personal data is requested if you voluntarily register to receive additional information about Cboe Vest. Voluntary Cboe Vest Website registration forms may request user personal data such as name, mailing address and/or e-mail address. Registered

users of Cboe Vest Websites may have certain "opt-out" choices which are described in the choice/opt-out section below.

## **What Data We Share**

Cboe Vest will only grant access to personal data on a need-to-know basis, and such access will be limited to the personal data that is necessary to perform the business function for which such access is granted. No authorization will be extended to access personal data on a personal basis.

From time to time, your personal data may be processed on our behalf by, or shared with, Cboe Vest affiliates and other unaffiliated parties. (collectively "third parties"). Third parties who process your data may include agents, suppliers, vendors, business partners, and regulatory agencies that are located in the United States and in other countries inside and outside the European Economic Area ("EEA") for the purposes outlined above. For data transfers outside the EEA to third parties, Cboe Vest relies on appropriate safeguards, as defined in GDPR and as approved by the European Commission, to provide an adequate level of protection.

Select third party providers which may process your personal data may be found in the "Service Providers" section below.

## **Security**

Cboe Vest shall exercise reasonable precautions to safeguard and secure personal data. Cboe Vest has security protections in place that help to protect against the loss, misuse and alteration of the data under our control. Security protections use technology consistent with current industry standards. Cboe Vest periodically tests the security protections of its information systems and monitors the effectiveness of its information security controls, systems and procedures. Although we take proper measures to safeguard against unauthorized disclosures of data, no assurances can be provided that personal data that we collect will never be disclosed in a manner that is inconsistent with this Privacy Notice and Policy.

## **Data Retention**

Cboe Vest will retain your personal data for as long as your account, membership, customer relationship or any other business relationship with Cboe Vest, as applicable, is active and as needed to provide you with products or services. In addition, personal data may be retained for such additional time as may be required under applicable law. If you wish to cancel your account or request that we no longer use your personal data to provide you with products or services, contact us using the contact information provided below.

## **Logged Files**

Cboe Vest Websites log IP addresses and browser types for administrative purposes, including logging the IP addresses associated with each post to or use of a Cboe Vest Website. Such logs will be reviewed in order to improve the user experience and to improve the materials and content available on a Cboe Vest Website. In addition, such information may be used for information security-related activities in connection with performance monitoring, investigations, questions, claims or complaints relating to use of a Cboe Vest Website.

## **Cookies**

When you use a Cboe Vest Website, Cboe Vest and third-party service providers may use "cookies." Cookies involve placing small files/code on your device or browser that serve a number of purposes, such as remembering

your preferences (e.g., language) and generally improving your experience on Cboe Vest Websites. Specifically, we may use such technology for purposes such as to:

- Gather analytics about Cboe Vest Websites, including demographic information in a non-identifiable form, in order to improve Cboe Vest Websites' performance and customize users' experience;
- Support security measures, such as requiring re-login into your account; and
- More effectively market Cboe Vest Websites and advertise other websites (including those of our advertising partners) that may be of interest to you.

You can set your browser to notify you when you receive a cookie, giving you the opportunity to decide whether to accept it. You may continue browsing a Cboe Vest Website even if you decide not to accept the cookie, however certain capabilities of Cboe Vest Websites may be impaired. This Privacy Notice and Policy covers the use of cookies by Cboe Vest Websites and does not cover the use of cookies by any service providers to Cboe Vest Websites. [See also the "[Select Service Providers](#)" section below.]

## **Policies for Children**

Cboe Vest does not intentionally collect or use any personal data from users under 16 years of age. No data should be submitted to Cboe Vest Websites by users under 16 years of age.

## **Links to Third-Party Websites and Framing**

For the user's convenience, Cboe Vest Websites may provide links to other external websites. The listing of a link by Cboe Vest should not be construed as a sponsorship, endorsement or approval of such websites, their content, or as an indication of the value of any claims, recommendations or other information contained therein. Cboe Vest Website users should be aware that Cboe Vest has no control over any linked website and is not responsible for the contents or privacy practices of any linked website or any link on a linked website. Cboe Vest urges our users to be aware of when they exit the Cboe Vest Website and to carefully read the privacy statements of each website that collects personal data. This Privacy Notice and Policy is applicable only to data collected by a Cboe Vest Website.

## **Access to Personal Data**

If you choose to update or delete personal data previously provided to Cboe Vest, to the extent allowed by law, Cboe Vest will endeavor to correct, update or remove the personal data being maintained by Cboe Vest. You can do this by contacting us at [info@cboeinvest.com](mailto:info@cboeinvest.com).

## **Choice/Opt-Out**

Cboe Vest Websites provide registered users the opportunity to opt out of receiving communications from us at the point where we request data about the user. If you opt in, Cboe Vest may (1) share the data with those organizations with which Cboe Vest has a direct or indirect business relationship; (2) use the data for its own internal purposes, or (3) contact you for market-related research.

If you prefer not to receive traditional mail or other off-line promotions from Cboe Vest or from organizations with which Cboe Vest has a direct or indirect business relationship, you may send an e-mail to [info@cboeinvest.com](mailto:info@cboeinvest.com). Please include your full name and mailing address.

To remove yourself from any Cboe Vest e-mail lists, you may send an e-mail to [info@cboeinvest.com](mailto:info@cboeinvest.com).

If you have any other questions about opting out of any communications from Cboe Vest, you may send an e-mail to [info@cboeinvest.com](mailto:info@cboeinvest.com).

## Data Subjects Rights Under GDPR

To the extent provided for under GDPR, effective May 25, 2018, if you are a data subject in the European Union you are entitled to access your personal data; obtain information on the processing of your personal data; have your personal data rectified or erased or their processing restricted; or exercise your right to data portability. You also are entitled to withdraw any consent that you might have given to the processing of your personal data, including any consent for any direct marketing purposes with future effect. These are known as “Data Subjects Rights.”

If you would like to exercise your Data Subjects Rights or learn more about the details of the processing of your personal data, please contact us using the information provided below or please fill out a form provided [here](#). Cboe Vest will respond to your request(s) as soon as reasonably practicable within the legally required period of time. To help protect your privacy, Cboe Vest takes reasonable steps to verify your identity before granting access to your personal data or responding to your requests.

If you are not satisfied with Cboe Vest’s response or believe that we are not processing your personal data in accordance with applicable law, please contact Cboe Vest via email at [info@cboeinvest.com](mailto:info@cboeinvest.com). You also may contact or register a complaint with the competent supervisory authority or seek other remedies under applicable law.

## Special Cases

Cboe Vest reserves the right to disclose personal data in special cases, when we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury or interference with (either intentionally or unintentionally) our rights or property, other Cboe Vest Website users, or anyone else that could be harmed by such activities. We may also disclose personal data without notice to you in response to a subpoena, or when requested from a governmental, regulatory body or law enforcement agency or any other forum of competent jurisdiction when we believe in good faith that such disclosure is required, or to respond to any emergency situation.

## Select Service Providers

Cboe Vest uses Google Analytics, a web analytics service provided by Google. Google Analytics uses cookies or similar technologies to help Cboe Vest Websites analyze how users use Cboe Vest Websites. Please review ["How Google uses data when you use our partners' sites or apps"](#) for information about how Google uses information collected through Google Analytics and how you may refuse the use of cookies.

Cboe Vest uses [Hotjar](#) in order to better understand its users’ needs and to optimize this service and experience. Hotjar is a technology service that helps Cboe Vest better understand its users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don’t like, etc.) and this enables Cboe Vest to build and maintain Cboe Vest Websites with user feedback. Hotjar uses cookies and other technologies to collect data on Cboe Vest Website users’ behavior and their devices (in particular device’s IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display on website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor Cboe Vest will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar’s privacy policy by clicking on [this link](#).

You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of Cboe Vest's Websites and Hotjar's use of tracking cookies on other websites by following this [opt-out link](#).

**Interest-Based Advertising.** Cboe Vest may use third-party advertising companies to provide you with Cboe Vest advertisements that may be relevant to your interests, as determined by your activity on Cboe Vest Websites and other websites. This type of ad-customization is known as "online behavioral" or "interest-based" advertising. These advertising companies may use cookies or similar technologies to understand your interests based on, for example, pages visited and browsing patterns on Cboe Vest Websites. The data collected when you interact with Cboe Vest Websites, content or services is used to display ads for Cboe Vest products or services on third-party websites. You can generally opt out of receiving personalized ads from third-party advertisers and ad networks which are members of the Network Advertising Initiative (NAI) or which follow the Digital Advertising Alliance (DAA) Self-Regulatory Principles for Online Behavioral Advertising by visiting the opt-out pages on the NAI website ([www.networkadvertising.org/choices](http://www.networkadvertising.org/choices)) and the DAA website ([www.aboutads.info/choices](http://www.aboutads.info/choices)). Some of the third-party advertising companies used by Cboe Vest may have adopted the use of the DAA's Advertising Options icon (AdChoices) on these ads for the purpose of allowing users the ability to opt out of this form of tracking. You may click on the AdChoices icon to opt out of receiving interest-based ads that are served to you based on your activity on Cboe Vest websites and other websites. You can also elect to block all cookies by using the cookie blocking options built into your browser software [see the "Cookies" section above.]

## **Notice of Changes**

Cboe Vest reserves the right to update or change this Privacy Notice and Policy or any part of it from time to time without prior notice. Cboe Vest encourages you to review this Privacy Notice and Policy periodically for changes. You may at any time contact us to request a copy of this Privacy Notice and Policy.

## **Contact Information**

If you have any questions regarding this Privacy Notice and Policy, please contact us using the information below.

Cboe Vest  
Attention: Data Protection  
Email: [Info@cboeinvest.com](mailto:Info@cboeinvest.com)