

## FACTS

### WHAT DOES AMERAUDI ASSET MANAGEMENT DO WITH YOUR PERSONAL DATA?

#### Why?

Financial companies choose how they share your personal data. 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 data. Please read this notice carefully to understand what we do.

#### What?

The types of personal data we collect and share depend on the product or service you have with us. This data can include:

- Social Security number, employer information and any other personal data required to be collected under U.S. regulations.
- Account balances, account transactions and transaction history
- Investment account information and assets

#### How?

All financial companies need to share customers' personal data to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal data; the reasons Ameraudi Asset Management chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Ameraudi share?	Can you limit this sharing?
<b>For our everyday business purposes</b> — such as to open and maintain your brokerage and/or investment accounts, process your transactions, respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> — to offer our products and services to you	Yes	Yes
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For joint marketing with our affiliates</b>	Yes	Yes
<b>For our affiliates' everyday business purposes</b> — information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes</b> — information about your creditworthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	No	We don't share

#### To limit our sharing

Call us at the numbers below or email us.

**Please note:**

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to opt-out or opt-in to sharing your information.

#### Questions?

Call (212) 833-1090 or toll-free (855) 498-5528 or email us at [csvs@ameraudi.com](mailto:csvs@ameraudi.com)

## What we do

<b>How does Ameraudi Asset Management protect my personal information?</b>	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. We will only permit authorized employees trained in the proper handling of customer information to have access to that information.
<b>How does Ameraudi Asset Management collect my personal information?</b>	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>■ open an account</li> <li>■ make deposits or withdrawals from your account</li> <li>■ Seek advice about your investments</li> <li>■ Enter into an investment advisory contract</li> <li>■ Tell us about your investment or retirement portfolio or earnings</li> </ul> We also collect your personal information from other companies.
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply only to you.
<b>Definitions</b>	
<b>Affiliates</b>	Companies related by common ownership or control and, solely for the purposes of this privacy policy, any FINRA licensed broker dealer, SEC registered investment adviser, custodian or clearing firm whose services are utilized for the purposes of investment and/or advisory account opening and maintenance. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>■ <i>Ameraudi Asset Management's affiliates include companies with a common corporate identity of Ameraudi and Interaudi.</i></li> </ul>
<b>Nonaffiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>■ <i>Ameraudi Asset Management does not share with nonaffiliates so they can market to you.</i></li> </ul>
<b>Joint marketing</b>	A formal agreement between other financial companies or our affiliates that together market financial products or services to you. <ul style="list-style-type: none"> <li>■ <i>Ameraudi Asset Management jointly markets with Interaudi Bank.</i></li> </ul>

## Additional Information

### **Personal Data We Collect and Store**

We collect your personally identifying information such as your name, addresses, phone numbers and government-issued identification so that we may send you account information such as periodic statements and legal notices, and to verify your identity. We also collect data from you when you contact us by phone or email to discuss your accounts and services, such as your assets and your investment goals. When you log in to online or mobile banking we collect the IP address assigned to your computer by your internet service provider or the device ID of your mobile phone. We maintain your login history as part of our fraud prevention program. We do not use cookies\*, track your location or collect biometric data, such as a fingerprint, unless you choose to opt-in to those authentication methods. We do not knowingly collect data from minors under the age of 16 when visiting our website. However, if you make us aware that this has occurred we will remove the personal data from our systems. Ameraudi Asset Management does not sell your personal data. We store your data for the period of time your account is open and we continue to store your data once your account is closed in order to comply with U.S. federal and state regulations, generally for 7 years.

\* Cookies are small files that are stored on your device to keep track of your visit to our website and to save your preferences.

### **Processing and Usage of Personal Data**

We share your personal data with third-party service providers to provide some of the products and services you sign up for. For example to process debit and credit cards transactions and online bill pay check issuances. We only share the data necessary to provide the service. We share your credit card payment history with various credit bureaus; to law enforcement when required as part of an investigation and to respond to a court order. We use your data to verify your identity when communicating with you and when you log in to access your account information via online banking.

### **Data Protection**

We secure and protect your data by maintaining physical, electronic and procedural safeguards including firewalls, encryption, passwords and authentication technologies. We will only permit authorized employees who are trained in the proper handling of customer information to have access to your data. Our third party data processors are required to secure and protect your personal data and are prohibited from sharing your data. Our third-party data processors are subject to ongoing performance monitoring and an annual review of their IT security and data protection practices.

### **Accessing and Updating Your Personal Data**

Keeping your personal data current is very important. You may review and update or correct your personal data via online banking or by contacting your account representative.

### **Linking to Third-Party Websites**

Our website provides links to third-party websites that are owned and operated by other companies. When you click on a link to visit a third-party website you will be subject to that website's privacy and security practices which may differ from ours. You should familiarize yourself with the privacy policies, terms of use and security practices of the third-party website before providing any personal data on that website.