

Marstone Privacy Policy

Updated: December 31, 2023

Here at Marstone, LLC (“Marstone”), we are committed to maintaining the confidentiality, integrity, and security of personal information collected from our users. The privacy practices of this statement apply to services from Marstone available under the domain www.wealth.marstone.com (the "Site"). By visiting this Site, you agree to be bound by the terms and conditions of this Privacy Policy. This Privacy Policy describes the information, as part of the normal operation of our services, we collect from you and what may happen to that information. By accepting the Privacy Policy and our Investment Advisory Agreement, you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy is incorporated into and subject to the terms of the Marstone Terms of Service Agreement (hereinafter “Terms of Service”).

For the purposes of this Privacy Policy, a “User” is an individual who uses our website or mobile application to evaluate our service or for educational purposes, and a “Client” is an individual who signs Marstone’s Investment Advisory Agreement that entitles the Client to have their investment portfolio managed by Marstone. This Privacy Policy, as well as the Terms of Service, applies to both Users and Clients.

USER GENERATED CONTENT

What information do we collect?

- Information relevant to your computer, such as what type of device you are logging in from, the server from which you log-in, the IP address from which you log-in, and other types of anonymous information when you visit Marstone and become a customer of Marstone.
- Personal and financial information when you register and become a Marstone Client.
- User action(s) while visiting site or using our service(s).

Why do we collect it?

- Marstone is an SEC registered investment advisor. We are required to collect and maintain certain information under U.S. law and regulation.
- We collect your personal information to maintain your Marstone account, and to provide and enhance customer service and experience.
- To improve your experience, Marstone aggregates your personal information and performs certain analysis and reports. This analysis could include identifying demographic and investment trends for internal purposes. When we aggregate this information, we ensure that the Client information is not identifiable to any unaffiliated third party.

Definitions

Anonymized means to make anonymous. In other words, you are not individually identifiable from the information you provide.

Aggregated mean to combine several elements to form a whole. Basically, we combine certain content to form collective data that is not traced back to any single individual.

Using your data (For the purposes of this section, “We” refers to Marstone)

- We use your data to operate and maintain your account in accordance with U.S. law.
- We perform analytics to investigate and understand how our Site is used.
- We use your data to monitor and protect the security and integrity of our products.
- We use the analytics performed on this Site to better serve you and to market our products and service.
- We may disclose personal information, if required by law, such as a court order, subpoena, regulator, or summons.
- We may make certain disclosures, if we believe it necessary to investigate, prevent or take action regarding illegal activities, potential fraud, front-running or scalping, situations involving potential threats to the physical safety of any person, or violations of our Privacy Policy or Investment Advisory Agreements, or other laws.
- We will use User information and content to provide you with information and services, to customize your experience and to inform you about other products and services.
- We will aggregate and use User information and content to understand how our products and services are used, in order to better deliver our products and services and to help us innovate.
- We may utilize all third-party retrieved information in order to optimize your utilization of our services, including offering, marketing, or recommending additional services consistent with your investment objectives. You should refer to the Privacy Policy of your advisor and their affiliated institutions concerning their use and disclosure of your information.

Third Parties

- We do not sell, rent, or trade your personal information with any unaffiliated third parties.
- We may share your personal information with identification verification services, e-signature providers, and account aggregation services to serve you as a Client, or as required by law.
- We may use third parties service providers to perform analytics and marketing services on your behalf, and, if this is the case, we may disclose some personal information, aggregated and anonymized, or more fully where necessary to perform our services.

All of our third-party service providers are required to ensure that your personal information is anonymized and/or confidential.

What happens if Marstone is closed or sold?

Information about our Users, including personal information, may be disclosed, or transferred to entities now or in the future affiliated with Marstone or as part of any merger, acquisition, change of control, debt financing, insolvency, bankruptcy or sale of our assets. Such information may be used in the businesses of any entity receiving it. We may disclose personal information in specific other cases with your consent.

Analytics Services

We use analytics services to collect information about the usage of this site. This service collects information relevant to your computer, such as the type of device, server or IP address from which you are logging in, and other types of anonymous information (“Analytics Services”) when you visit or become a Client of Marstone. We use the information we get from these Analytics Services to improve this site and the services we provide.

These Analytics Services only collect the IP address assigned to you on the date you visit this Site,

not your name or other identifying information. The Analytics Services ability to use and share information about your visits to this site is restricted by their terms of use and privacy policies. We will never combine the information collected from Analytics Services with the content you upload to Marstone as a Client or User.

You can typically prevent Analytics Services from recognizing you on return visits to this Site by disabling cookies on your browser but doing so may limit customization of the Site to You.

1. HOW YOU ACCEPT THIS POLICY

By using the Marstone services, or otherwise providing us with personal information (such as an email address), you agree to the terms and conditions of this Privacy Policy.

2. CHANGES TO YOUR PERSONALLY IDENTIFIABLE INFORMATION

Once you have registered with Marstone, you can access your profile, and review or revise the personal information that is stored at any time. If you encounter problems, you can always contact us at wealth@marstone.com. Due to U.S. regulatory requirements, we may not delete residual or aged copies of information and must preserve all consumer data for a number of years.

If you wish to update or correct the personal information that you have submitted to us, you may do so via the website for your Marstone account or you can send an email to wealth@marstone.com.

DO NOT SEND CHANGES OF RISK TOLERANCE OR TRADING INSTRUCTIONS BY EMAIL.

3. RESTRICTING OR DELETING YOUR INFORMATION

Your data belongs to you, and you may request deletion of your personal information at any time. If you are a resident the State of California or of the European Union (including the U.K), specific rights may apply to you under the California Consumer Protection Act of 2018 (“CCPA”) (<https://oag.ca.gov/privacy/ccpa>) or General Data Protection Regulation (<https://gdpr-info.eu/art-17-gdpr/>), respectively. To request that your account be deleted, please contact us at wealth@marstone.com. We will remove your information as soon as practicable, however we will retain and archive any account information required by law or regulations. Beyond obligations required upon the rights identified above, for data removals performed in the ordinary course of business retention schedules, or for former clients, portions of your data may remain on our production and back-up servers indefinitely.

4. AS A VISITOR

We collect various types of anonymous information about visitors to Marstone, such as device-related information (browser type, IP address) and server log information (date and time you visited). We collect information that you received from our website and use this information to better understand our visitors and business, all to improve the Marstone services.

5. CHANGES TO OUR PRIVACY POLICY

You are encouraged to regularly review this Privacy Policy as we may change our policies and update this Privacy Policy periodically. The applicable date of our Privacy Policy appears at the top of the page. You agree to accept electronic notification of revised versions of this

Privacy Policy as posted on www.wealth.marstone.com. If we make material changes to this Privacy Policy, we will notify you here, by email or physical mailing or by posting a notice on our home page.

6. THIRD PARTY SHARING/EMAIL OPT OUT

Marstone complies with the Controlling the Assault of Non-Solicited Pornography and Marketing Act of 2003 (CAN-SPAM) and the CCPA. We may provide Users with periodic website related notifications, marketing offers, or other information via email. You may elect to stop receiving such messages by updating your account preferences on the Site or through your Marstone account, where available. You may also follow unsubscribe instructions included in promotional emails. Certain email messages we send are necessary for the proper functioning of our website, and Users may not opt-out. California residents may have a separate right to Opt-Out of sales of personal information. (If subject to CCPA, Marstone should contain a hyperlink to an email address for requesting opt out entitled "Do Not Sell My Personal Information.")

7. CHILDREN'S ONLINE POLICY

None of the features, services, and other aspects of www.wealth.marstone.com requiring the submission of personally identifiable information are intended for use by anyone under 18 years of age. We do not knowingly collect personally identifiable information from children under the age of 13 without parental consent. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed personally identifiable information to us, please contact us at wealth@marstone.com.

8. SOCIAL MEDIA

This Privacy Policy, and these terms, apply to Marstone-operated services and applications. This Site may contain links that access other websites and applications that are not operated or controlled by Marstone. The policies described herein do not apply to third party websites or applications.

9. QUESTIONS AND CONCERNS

If you have questions or concerns regarding this Privacy Policy, or if you have comments or feedback, please contact us at: wealth@marstone.com. For more general information regarding privacy you can visit the [Federal Trade Commission](http://www.ftc.gov) which offers an overview of general privacy protection.