

Interactive Brokers Asset Management Privacy Policy Notice

Last updated November 9, 2017

Covestor Limited doing business as Interactive Brokers Asset Management (hereafter referred to as “IBKRAM”) has adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about clients and Portfolio Managers is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you.

This policy outlines the types of information we collect about you and how we use and safeguard that information. If you have any questions or concerns regarding this statement, you should contact us at 1 (866) 825-3005.

1. What Information We Collect about Clients and Portfolio Managers

- a. When you sign up to become a client of or Portfolio Manager on IBKRAM, we collect certain non-public personal information about you (such as your name, address, social security number, email addresses, telephone numbers and personal, financial and investment status, etc.) from information that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, financial adviser, etc.).
- b. We also collect information about your brokerage accounts and transactions (such as account numbers, additions/withdrawals, purchases, sales, account balances, inquiries, etc.).

2. What Information We Collect from All Visitors

We collect two types of information from our users. The first is information that users provide through optional, voluntary submissions such as opening an account or requests to receive information from IBKRAM. The second is information that we gather through aggregated tracking information derived while you are browsing our website (<http://ibkram.com>). Anonymous information will be gathered in our computer system log files to allow us to better tailor our content to readers’ needs, help us better understand the demographics of our audience and improve our products. Under no circumstances do we divulge any information about an individual user to a third party.

3. What Information We Disclose

- a. We do not disclose any non-public personal information we collect about our clients and Portfolio Managers to anyone except:
 - i. in furtherance of our business relationship with our clients or Portfolio Managers and then only to those persons necessary to effect the transactions and provide the services that our clients or Portfolio Managers authorize (such as broker-dealers, custodians, etc.);

- ii. to persons assessing our compliance with industry standards (e.g. professional licensing authorities, etc.);
 - iii. to our attorneys, accountants, and auditors or as otherwise required by government agencies and other third parties by law; and
 - iv. to third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose.
- b. If you decide at some point to either terminate our services or become an inactive client or Portfolio Manager, we will continue to adhere to our privacy policy, as may be amended from time to time.

4. Security of Your Information

- a. We restrict access to your non-public personal information to those employees who need to know that information to service your account.
- b. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your non-public personal information.
- c. Our website (<http://ibkram.com>) uses secure socket layer technology (SSL) so that information displayed and submitted by you is always encrypted. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

5. Communications

- a. We will send you communications related to the servicing of your account when necessary to do so. These include but are not restricted to client take-on instructions and order confirmations.
- b. We will send you service-related announcements on rare occasions when it is necessary to do so. For instance, if our service is temporarily suspended for maintenance, we might send you an email.
- c. You may not opt-out of account servicing or service-related announcements, which are not promotional in nature.
- d. We will send you occasional emails updating you about our service. You may unsubscribe from these at any time.

6. Website Usage

- a. When you visit our website we use “cookies” or other similar web tools to enhance the user experience. These tools enable us to maintain your web session while you browse the site as well as helping us provide you with a better, more personalized experience. Our cookies do not contain any personally identifiable information.

- b. IBKRAM automatically receives and records information on our server logs from your browser including your IP address, IBKRAM cookie information and the pages you request. We use this information to improve the functionality and usability of our services. Our log files are not tied to personally identifiable information.

7. Amending Your Account Information

- a. We are committed to keeping accurate and up-to-date records to help ensure the integrity of the services we offer. If you identify an inaccuracy in, or need to make a change to your account information, please either update the information if you are able to do so directly on our website or alternatively contact Client Services by phone at 1 (866) 825-3005 or by email at clientrelations@ibkram.com.
- b. IBKRAM has the right to edit, remove or add any information at any time at its sole discretion.

8. Changes to Our Privacy Policy or Relationship with You

- a. Our policy about obtaining and disclosing information may change from time to time.
- b. We will provide you notice of any material change to this policy before we implement the change.