

## PRIVACY POLICY

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McLean Asset Management Corporation is committed to safeguarding the confidentiality and security of its clients' personal and private information. As a user of the McLean Asset Management Corporation website and/or all associated websites, and other services (collectively, "McLean", "we", "us", or "our"), your privacy is important to us. This policy (this "Privacy Policy") discusses the information we collect about you, how we treat it, with whom we share it, and how we protect it.

### INFORMATION WE COLLECT

**In the normal course of business, we collect personal information about you from a variety of sources, including:**

- Information from you, such as information we receive from you during registration and on account applications or other forms (such as your name, address, email address, phone numbers, social security number, citizenship status, investment experience and goals, other regulatory disclosures, marital status, employment, assets, and income); and
- Information about you, your accounts, and your holdings and transactions that we receive from you or others, such as third-party aggregators, account custodians, brokers, and other financial services firms, banks, or ERISA plan sponsors.

We collect information from you when you send us feedback as well. Some information we collect is not explicitly submitted by the user. Examples of such information include (but are not limited to): usage information, browsing activity, click activity, browser-related information, IP address, requested URL, referring URL, and timestamp.

### WHEN WE DISCLOSE YOUR PERSONAL INFORMATION

We do not sell information about current or former clients to third parties. We do not disclose the nonpublic personal information we collect about our current, former, and prospective clients to anyone except:

- in furtherance of the business relationship which we conduct on a client's behalf, and then only to those persons necessary to effect the transactions and provide the services that a client authorizes (such as broker-dealers, custodians, independent managers);
- to persons assessing our compliance with industry standards (e.g., professional licensing authorities);
- our attorneys, accountants, and auditors (to the extent necessary);
- investigate or prevent any actual or potential fraud or other criminal activity or comply with law or legal process;

We may also disclose personal information for everyday business purposes to organizations or firms who provide consulting, technology, or other services for us and agree to maintain its confidentiality and not use it for any other purpose; others, such as attorneys, trustees, family members, or others who are authorized to represent you, your estate, or a joint or co-owner of your account; or regulatory agencies.

We do not permit clients to opt-out of these limited sharing scenarios. We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative services on our behalf). Any third party that is in receipt of nonpublic personal information is prohibited to use or share the information for any other purpose.

## HOW WE USE INFORMATION COLLECTED ABOUT YOU

Your personal and investment information is maintained by McLean to provide you services and support and to fulfill our legal and regulatory requirements. We may also share information you provide with our brokerage partners to create a brokerage account for you, and with other third-party service providers where you have expressly authorized us to do so. We may use your brokerage account information to rebalance your accounts and keep your accounts in line with the investment preferences that you specify to us.

Data that does not include personally identifiable information may be used for research purposes. For instance, we may compile data, excluding personally identifiable information, for purposes of demographic analysis and research. We may use usage information, browsing activity, click-through activity, browser-related information, IP address, requested URL, referring URL, and timestamp information to help us diagnose problems with our servers, administer our website and services, and otherwise provide the highest possible level of service to you. In addition, we use this data in an aggregated, non-personally identifiable manner to perform statistical analyses of user behavior and characteristics in order to measure interest in and use of the various areas of our website and services.

## USE OF COOKIES AND PIXELS

Like most websites, our sites require cookies to function properly. Cookies are small text files that reside on a user's computer and identify you as a unique user. Pixels are small code blocks on a website that allow for another server to measure viewing of a webpage and often are used in connection with cookies. We and certain of our third-party service providers use cookies and pixels to refine our services, simplify the user experience and in some cases, provide targeted advertising and content. We and third parties may tie personally identifiable information such as your email address to cookies and pixels. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature; however, you should note that cookies might be necessary to provide you certain features (e.g., customized delivery of information).

## GOOGLE ANALYTICS

We use third-party analytics tools, including "Google Analytics", to collect information about the usage of this site. Google Analytics collects information about how often users visit this site, what pages they visit when they do so, and what other sites they used before coming to this site, among other information. We use this information to understand user interaction to improve this site.

Google Analytics collects the IP address assigned to you on the date you visit this site, along with other anonymized information (e.g., browser type and type of device used to visit the site), but not your name or other personally identifiable information. Google Analytics' ability to use and share information about your visits to this site is restricted by their terms of use and privacy policies. We do not combine the information collected through the use of Google Analytics with personally identifiable information.

You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser. You can opt-out of Google Analytics by installing the Google Analytics Opt-out Browser Add-on [here](#) or visiting <https://tools.google.com/dlpage/gaoptout>.

## **SAFEGUARDING INFORMATION**

McLean accounts are password-protected. We restrict access to your nonpublic personal information to our employees and to permitted third parties who need to know that information to provide products or services for us, or to provide, process, or maintain any security, account, or investment product, service, or program for you or your benefit. Furthermore, we make every reasonable effort to ensure that our office and computer environments are secure, and maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards. Outdated personal information will be securely maintained for a period of time as required by law, then destroyed.

## **RESPECTING CHILDREN'S PRIVACY**

This website is not directed to children, and we do not knowingly solicit information from any person under the age of 18. If a parent or guardian becomes aware that his or her child has provided us with personally identifiable information without his or her consent, he or she should contact us. Should a person whom we know to be under 18 sends personal information to us, we will delete it as soon as possible.

## **MCLEAN IS INTENDED FOR U.S. CUSTOMERS**

McLean is hosted in the United States. This Privacy Policy is intended to comply with privacy laws in the United States and may not comply with all privacy laws in foreign countries. If you are a non-US user of McLean, by using McLean and providing us with data, you acknowledge, agree, and provide your consent that your personal information may be processed in the United States for the purposes identified in this Privacy Policy. In addition, such data may be stored on servers located outside your resident jurisdiction, which may have less stringent privacy practices than your own. By using McLean and providing us with your data, you consent to the transfer of such data and any less stringent privacy practices.

## **CONTROL OF PERSONAL INFORMATION**

We give you the opportunity to opt-out of receiving communications from us and to view, correct or remove your personal information. If you wish to opt out of receiving promotional content, you can follow the unsubscribe instructions provided alongside any promotional correspondence from us. In addition, if at any time you wish not to receive any future promotional communications or you wish to have your name deleted from our mailing lists, please contact us at <https://www.mcleanam.com/contact-us/>. Please note that we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, provide services, and enforce our agreements.

## **MODIFICATIONS TO THE PRIVACY POLICY**

By using McLean, you signify your agreement to the terms of our Privacy Policy. If you do not agree with these terms, you should not use McLean. We may modify this Privacy Policy at any time. If a material change is made to this Privacy Policy and/or the way we use our users' personally identifiable information, then we will provide notice to clients and post a prominent notice of the nature of such change on the first page of this Privacy Policy. You are responsible for reviewing this Privacy Policy periodically to ensure that you are aware of any changes to it. Your continued use of McLean indicates your assent to any changes to this Privacy Policy.

## **LEGAL NOTICE**

If any part or parts of this Policy are found under the law to be invalid or unenforceable by a court of competent jurisdiction, then such specific part or parts shall be of no force and effect and shall be severed and the remainder shall continue in full force and effect.

## **GOVERNING LAW**

This Policy is governed by and construed in accordance with the laws of the Commonwealth of Virginia and you irrevocably submit to the exclusive jurisdiction of the courts of the Commonwealth of Virginia.

## **CONTACT**

If you have questions, comments, concerns or feedback regarding this Privacy Policy or any other privacy or security concern, please contact McLean at <https://www.mcleanam.com/contact-us/>.