



Privacy Policy

Last Updated March 30 2019

Your Privacy Matters

Your privacy is important to us. We want you to understand how we may collect, use, share, and keep information about you and the choices that are available to you. This Privacy Policy sets forth the types of information we may collect about you, the purposes for which we use the information, the circumstances in which we may share the information, and other important terms that apply when you use the website located at www.Abbilon.com or Abbiloninvestments.com, abbiloncapital.com, blog.abbilon.com (each a "Site") and any associated mobile applications (the "Application"). The Sites and Application are operated by Abbilon LLC ("Abbilon" "we," "us," or "our") in connection with its digital advisory services offering ("DAS").

By using the Sites and/or Application, you agree to this Privacy Policy, as it may be amended from time to time in the future (see "Changes to this Privacy Policy" below). If you are a client, prospective client, or former client of Abbilon Investments, LLC or Abbilon, please remember as you review this Privacy Policy that information you provide to us may be governed by our Privacy Notice and, if applicable, our Privacy Notice for California Residents. Please refer to those notices for additional information about our privacy practices and your rights and choices.

Introduction

Abbilon operates an interactive platform that allows you to obtain certain investment advisory services (collectively, the "Services"). Through DAS, Abbilon offers individuals the ability to open advisory accounts for themselves and jointly with other individuals, as well as individual retirement accounts, through the Sites and Application ("Program"). Our Services offered under the Program allow you to participate by opening a User Account and an Advisory Accounts (as defined in the Terms of Use; collectively, "Accounts") that we will manage in accordance with the Program, and, based on the information that you provide, select a portfolio within the Program.

Our Services are made available through the Sites and Application. In this Privacy Policy, we use the term "Personal Information" to describe information that identifies an individual or describes, relates to, or is associated with an identifiable individual. Personal Information does not include information that has been anonymized or aggregated so that it does not identify an individual. Personal Information We Collect We collect Personal Information when you voluntarily, or a third party acting upon your instruction, provide it to us, such as when you seek to open an Account, answer questions on one of our Sites or in our Application to determine what kind of portfolio we might recommend to you, complete a survey or otherwise provide feedback regarding the Services, or contact us with questions.

Personal Information We Collect

The Personal Information we may collect from you includes, but is not limited to, the following:

- Name;
- Contact information, such as e-mail address, mailing address, and phone number;

- Social Security Number or Individual Taxpayer Identification Number;
- Date of birth;
- Citizenship information;
- Occupation;
- Tax filing status;
- Financial information (such as information about your income, savings, and sources of wealth);
- Information about your transactions and experiences with us;
- Login credentials, routing numbers, and account numbers for the bank accounts you choose to link to our Services and information in those accounts; and
- Other information that we determine to be necessary or appropriate to provide the Services or that may be required under federal and certain state laws, such as bank account information, marital status, and employer information.

We may also collect information from you regarding any beneficiaries of your Account, or trusted contact persons associated with your Account, to provide the Services to you. We may combine the Personal Information we collect from you with information we receive about you from other sources, such as address verification services and third-party providers of demographic and fraud prevention information. We may offer you the option to log into the Application using Touch ID or Face ID, pursuant to the Touch ID and Face ID provisions contained in the terms and conditions of the Application.

How We Use Your Personal Information

Abbilon may use your Personal Information as follows:

- To provide Services to you, which may include sharing such information internally as well as disclosing it to third parties, as described in this Privacy Policy and other privacy notices that we may provide to you in connection with the Services;
- To respond to your inquiries, fulfill your requests, complete your transactions, and provide you with related customer service;
- To authenticate your identity and perform background checks;
- To send administrative information to you, such as contribution and withdrawal notifications, communications relevant to your use of the Services, and changes to the Site, the Services, and our terms, conditions, and policies;
- To send you marketing communications that we believe may be of interest;
- To improve Site and Application performance and personalize your experience with the Sites and the Services, including by presenting content, products, and services tailored to you;
- To comply with contractual obligations, relevant industry standards, and our policies;

- For our business purposes, such as data analysis, audits, market research, project planning, troubleshooting problems, developing new products and services, enhancing, improving, or modifying our services, identifying usage trends, fulfilling our legal and regulatory requirements, 3 enhancing the security of the Sites, Application, and Services, and detecting and protecting against error, fraud, or criminal activity;
- Perform analytics concerning your use of our online services, including your responses to our emails and the pages and advertisements you view while using the Sites or Application;
- For any other purpose that we disclose at the time you provide, or when we collect, your information; and
- For other purposes permitted by applicable law.

How We Share Your Personal Information

We may share your Personal Information with:

- The third-party custodian for your account, for any legal purpose, including to satisfy the custodian's regulatory requirements as a broker-dealer and custodian, including IRA custodian where applicable, and to facilitate the execution of transactions, including contributions and withdrawals;
- Our affiliates, for their everyday business and marketing purposes as well as in connection with providing the Services; and
- Our third-party service providers, who provide services such as website hosting, data analysis, information technology and related infrastructure provision, customer service, e-mail delivery, auditing, and other services.

If you access the Services as brought to you by a third party through a co-branded URL, your e-mail address used to access the Services may be provided to that third party.

Other Uses and Disclosures

We may also use and disclose your Personal Information as we believe to be necessary or appropriate:

- (a) to comply with applicable law, to respond to requests from public and government authorities, to cooperate with law enforcement, or for other legal reasons;
- (b) to enforce our terms and conditions and contractual rights; and
- (c) to protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others.

In addition, we may transfer Personal Information to a third party in the event of a merger, divestiture, restructuring, reorganization, dissolution, bankruptcy, or other sale or transfer of any or all of our business, assets, or stock, and during negotiations for the same. We may aggregate your Personal Information in a manner that no longer reveals your specific identity. We may use and disclosed aggregated information for any purpose. We may also use and disclose, for any purpose, information

that does not reveal your specific identity or directly relate to you as an identifiable individual, including the information described under “Information Collected Automatically,” below. If, however, we are required to treat such information as Personal Information under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Information, as detailed in this Privacy Policy.

Access and Choice

If the Personal Information on file for you changes, or if you no longer desire our Services, you may correct, update, or amend your Personal Information on the Sites, the Application, or by e-mailing Customer Support at support@Abbilon.com.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed. If you decide at any time that you no longer wish to receive marketing e-mails from us, please follow the “unsubscribe” instructions provided in such e-mails.

Please note that you cannot opt out of administrative e-mails, such as regulatory, billing, or service notifications. You may stop the receipt of push notifications on your mobile device through your device settings.

Information Collected Automatically

When you use our Services, we automatically record information such as browsing activity and data displayed or clicked on (such as user interface elements, ads, and links) and collect other information such as the type of device you use, browser type, operating system version, IP address, and date and time of access. We use certain technologies, such as cookies, web beacons, and similar technologies, to collect information automatically from you when you use the Services. We may use these technologies to, for example, record your preferences, track your use of the Services across multiple devices, measure exposure to our online advertisements, monitor traffic, analyze use of the Services, for security purposes, to display information more effectively, to personalize your experience, and to improve the Services. You have choices to limit some tracking mechanisms. Many web browsers automatically accept cookies, but you may be able to modify your browser’s settings to decline cookies. If you choose to decline cookies, certain features may not function properly or may not remain accessible to you. In addition, you may also render some web beacons unusable by rejecting or removing their associated cookies. We may also use information collected automatically from a particular browser, device, or application to recognize you on another browser, device, or application linked to you, for fraud prevention and other purposes.

Log File Information

Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating

system name and version, device manufacturer and model, language, and Internet browser type and version. We use this information to ensure that the Services function properly.

IP Address

Your IP address is automatically assigned to your computer by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the pages visited. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Services. We may also derive your approximate location from your IP address.

Cookies

Cookies are small text files that may be placed on your device when you visit the Services or when you view advertisements that we have placed on other websites. Cookies allow your browser to remember some specific information which the web server can later retrieve and use. When you quit your browser, some cookies are stored in your computer's memory, while some expire or disappear.

Tags, Pixels, Web Beacons, Clear GIFs

A web beacon, also known as an Internet tag, pixel tag, or clear GIF, is typically a one-pixel, transparent image located on a webpage or in an e-mail. These may be used when you are served with advertisements, when you interact with advertisements outside of our online services, or when you interact with our communications. They are generally used to transmit information back to a web server, and they help us measure the success of our marketing campaigns and compile statistics about usage of the Services.

Other Technology

We use the Google Maps API to help pre-fill in address information. To learn about Google's privacy practices, click <http://www.google.com/policies/privacy>.

Do Not Track Signals

We do not respond to browser do-not-track signals at this time.

Security

We take the security of your Personal Information seriously. We seek to limit access to your Personal Information to authorized employees, agents, contractors, or vendors. We also maintain physical, electronic, and procedural safeguards designed to protect the information against loss, misuse, damage, or modification, and unauthorized access or disclosure while in our possession. No data transmission or storage system can, however, be guaranteed to be fully secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contact Us" section below.

Other Important Information

Social Media and Links to Other Web Sites and Apps This Privacy Policy applies only to the Sites, the Application, and Services. However, the Sites and the Application may contain links to other web sites and apps that are not operated or controlled by Abbilon and for which we are not responsible. We encourage you to review the privacy policies of third-party properties before using them.

Minors

The Services are not directed to and may not be used by anyone under the age of 21 and, as such, we do not knowingly collect Personal Information from anyone under the age of 21. If you are under the age of 21, please do not submit any Personal Information to Abbilon or use the Services. If a parent or guardian becomes aware that his or her child under the age of 21 has provided us with Personal Information, he or she should contact us at support@Abbilon.com, and we will, subject to our recordkeeping obligations under the Investment Advisers Act of 1940 and other applicable law, delete such information from our files.

Changes to this Privacy Policy

We may update this Privacy Policy to reflect changes to our information practices or legal requirements. The effective date at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Sites or Application. Your use of the Sites or App following these changes means that you accept the revised Privacy Policy.

Other Important Information

The Services are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country, or territory other than that of the United States. You must be an individual of at least twenty-one (21) years of age and reside in the United States, on a United States military base, or in a United States Territory in order to use the Services.

If you use the Services outside of the United States, you understand and consent to the transfer of your Personal Information to, and the collection, processing, and storage of your personal information in, the United States and elsewhere. The laws in the United States and these countries regarding Personal Information may be different from the laws of your country. Contact Us If you have any questions about our Privacy Policy, please contact us at support@Abbilon.com.