

MVM Advisors LLC Privacy Policy

Last updated on January 2020

This is MVM Advisors LLC Privacy Policy (the “policy”) it describes the specific policies and procedures we use to collect, utilize, disclose, share and protect your Personal Information. We refer to MVM Advisors LLC and our operating affiliates, collectively as “MVM”, “we” or “us”. This Privacy Policy governs our use of your Personal Information.

MVM is committed to the protection of our visitors, users and clients (also referred to as “you” or “your”) privacy. We understand that keeping your information secure and confidential is critical to earning and keeping your trust. **MVM does not rent, sell or trade your Personal Information.**

How to Use this Privacy Policy

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. MVM does not share with non-affiliates so they can market to you.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. MVM does not share your info with joint marketing partners include service and insurance providers.

This policy describes if and how your Personal Information is shared and/or disclosed, how we collect and use other information and how we address other privacy matters – such as deletion of your Personal Information upon request and opting-out of marketing communications. Lastly, we describe methods for contacting MVM if you have privacy questions, comments or feedback.

Transparency is one of the best ways to earn your trust. The summary table below explains what information we collect from you and why, based upon your relationship with us and as your relationship evolves with MVM. This progression model is presented below.

	Description	What we collect	Why we collect it
Visitors	Individuals who visit our Public Website without logging into an account or using our service	<ul style="list-style-type: none"> ➤ Your internet protocol (IP) address ➤ Your cookie information ➤ Where do you visit us from ➤ Your browser information 	<ul style="list-style-type: none"> ➤ For security analysis purposes ➤ To understand who is interested in our services ➤ To assess the effectiveness of our marketing efforts ➤ To monitor usage patterns and improve our site or products
Users	Individuals who establish an account with us or otherwise use our services offering, including our financial dashboard software	<ul style="list-style-type: none"> ➤ Your email address, name and phone number ➤ Your financial credentials and information (optional) ➤ Financial planning information (goals, age, retirement, family, ect.) (optional) 	<ul style="list-style-type: none"> ➤ For security purposes ➤ To provide you with our service and consolidated financial dashboard ➤ To contact you to propose and/or perform our complimentary consultation (if eligible)
Advisory Clients	Individuals who become clients of our Wealth Management and financial advisor services and establish an MVM managed investment account	<ul style="list-style-type: none"> ➤ Detailed personal information to open your accounts (e.g.: SSN, name, address, spouse, ect.) 	<ul style="list-style-type: none"> ➤ To open your investment accounts with us – inform your financial advisors to provide you personalized service – regulatory and legal requirements

How We Collect & Use Your Information

“Personal Information” means your personally-identifiable information such as your name, email or mailing address, phone number, account credentials, social security number, government ID numbers and other information that can be used to identify you personally.

Please Note MVM does not collect or have access to your passwords for any account held with your custodian of choice.

We also collect and use other information that we obtain from your activities using our services. This includes information that you do not explicitly provide to us, but which may be implicitly provided to us as part of such activities. More information on this is provided below under the Visitors use case.

The following describes in further detail the information we collect at various stages of our relationship with you.

Visitors

When you visit any of our websites or download our apps, we consider you a **Visitor**. This section describes our privacy practices related to this use case.

What do we collect?	Why do we collect it?	Can you limit?
MVM Cookies	<ul style="list-style-type: none"> To recognize you when you make a return visit and deliver overall a consistent experience 	Most modern browsers allow you to delete or limit cookies.
Third-Party Tags and Cookies	<ul style="list-style-type: none"> To measure our marketing effectiveness 	Most modern browsers allow you to delete or limit cookies, including third-party cookies however you may not be able to limit marketing tags entirely unless you do not visit our sites.
Internet Protocol (IP) Address	<ul style="list-style-type: none"> As part of the basic function of the internet To measure who is visiting us and where they are from 	The only way to avoid this is not visiting our sites.
Browser Metadata Such as browser type, version, your operating system, system language, etc.	<ul style="list-style-type: none"> As part of the basic function of the internet To ensure we maintain a positive website experience for most used browsers 	Browsers communicate this automatically. However some third-party extensions may allow you to limit this.

What Visitor information do we share?

We may share Visitor information in an anonymized format with our marketing partners for the purpose of measuring the effectiveness of our marketing campaigns.

Users

When you register, create a User Account on one of our Non-Affiliate software suppliers or Custodian’s Dashboard and begin using their services, we consider you a **User**. This section describes our privacy practices related to this use case. Keep in mind **Users** are also considered **Visitors** so this is information we collect in addition to what was described for **Visitors**.

What do we collect?	Why do we collect it?	Can you limit?
Email	<ul style="list-style-type: none"> Email you about service updates, maintenance activities, security notifications Email you about service and/or product offerings, surveys and other marketing promotions Allow our team to contact you 	No, that is required to have a functioning account.
Phone Number	<ul style="list-style-type: none"> We may also, at your request or as appropriate for your situation and needs, contact you to recommend services and/or product offerings Allow our team to contact you if needed, or at your request 	You can call us and ask to be put on our Do Not Call list.
<i>[Optional]</i> Financial Planning Information Includes your age, retirement age, retirement plan information, risk tolerance, family information and other demographic or related information	<ul style="list-style-type: none"> To provide you access to our free Retirement Planner service and design your personalized retirement plan To perform an analysis of your investments (or other product features) If qualified, provide you with a free financial consultation with one of our advisors 	Yes, those are optional services which you are free to use or not use.
<i>[Optional]</i> Financial Account Information For third-party financial accounts you link - this includes your transactions, balances, assets held, and other account information.	<ul style="list-style-type: none"> To provide you with a holistic view of all of your finances in our Non-Affiliate software suppliers Dashboard To provide you access to our free financial planning tools such as our Cash Flow tool, Budget tool and others To allow background automatic refreshes of your data such that your Dashboard is always up to date 	Yes, those are optional services which you are free to use or not use.

What User information do we share?

Personal Information

Sharing Category	What do we share and why?
<i>Our Service Providers</i>	As most businesses, we use third-party service providers to deliver the services mentioned in this Privacy Policy. In doing so, we provide some of your data (including your Personal Information) to those third-party service providers, on a need to know basis. Those service providers are required under contract with us to safeguard your information. Except where expressly set forth in this policy, our third-party service providers may only use your data to provide services to us or to improve their services.
<i>Marketing Partners</i>	We do not share users’ emails (or email hashes) and names. We do not sell or allow your information to be used for any purpose other than to provide services to us.
<i>Security, Legal & Regulatory Requirements</i>	We also reserve the right to disclose information about you that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of the Service and any facilities or equipment used to make the Service available, (v) if mandated by law or regulatory requirement, or (vi) protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights, property, or safety of others.

Anonymized Information

We may share anonymized information that is summarized or derived from information you provide to us as explained in the table below. Anonymized information is information that does not include any personally identifiable information.

Sharing Category	What do we share and why?
<i>MVM Research</i>	From time to time MVM performs analysis on personal finance and related topics, utilizing anonymized and summarized insights from our users and clients. Such research reports or findings may be shared with external publishers or published by us to further public awareness and understanding on financial topics of interest.
<i>Service Providers</i>	As most businesses, we use third-party service providers to deliver the services mentioned in this Privacy Policy. In doing so, we authorize some Service Providers to use anonymized information to provide services to us or to improve their services generally.

Advisory Clients

If you are opening a wealth management advisory account with us and utilizing our fee-based advisory service, we consider you an **Advisory Client**. **Advisory Clients** are also considered **Users** and **Visitors**, so this section describes information that we collect in addition to what was described previously, as applicable.

As part of our relationship with you as an **Advisory Client**, we will utilize the information we have on your financial dashboard in order to provide you with our holistic financial advice. We may also, at your request or as appropriate for your situation and needs, recommend third-party services to you.

What do we collect?	Why do we collect it?	Can you limit?
<p>Detailed Account Information</p> <ul style="list-style-type: none"> Name Date of birth Social Security Number Physical and Mailing address State ID, Diver’s License or Passport number Citizenship and country of birth Income and other financial information Occupation Tax planning information Transferred securities information such as cost basis Your beneficiaries Contact information for investment accounts or banks you want to move funds from Your investment objectives, if not previously collected Other required personal information 	<ul style="list-style-type: none"> To verify your identity and develop a behavior profile to enable us to better serve you and help prevent fraud Helping you in opening an account, with an independent securities brokerage trading and clearing custodian account or banking institution Enabling us to assist you in funding your accounts with your other investment assets or cash Providing the independent broker or banking institution with ongoing information required to provide continuing services to you Allowing us to perform tax analysis on the movement of assets, if applicable. Designing, implementing and managing your investment portfolio strategy Providing you with account statements, trade confirmations, tax information and other notifications related to the Advisory Service Satisfying legal and regulatory requirements 	<p>Yes, becoming an advisory client is entirely voluntary. If you opt to become an advisory client, this information is required.</p>

What Advisory Client information do we share?

MVM’s core business is wealth management. This means that our objective is to win you over as an MVM Advisory Client. **We do not rent, sell, or trade your Personal Information.** We do share some information as described in the table below.

Sharing Category	What do we share and why?
<i>Your brokerage account(s)</i>	<p>As an advisory client of MVM, you will have a custodial brokerage account to hold your personal portfolio, and we will share Detailed Account Information with them. You will have direct visibility, access, and interaction with your custodian while you are an MVM Advisory Client. We encourage you to review your chosen custodian’s Privacy Policy.</p> <p>MVM does not share this information with other third parties.</p>

Procedure for protecting the confidentiality and security of nonpublic personal information

MVM has adopted various procedures to implement the firm's policy and conducts reviews to monitor and ensure the firm's policy is observed, implemented properly and amended or updated as appropriate, which include the following:

Non-Disclosure of Client Information

MVM maintains safeguards to comply with federal and state standards to guard each client's non-public personal information ("NPI"). MVM does not share any NPI with any nonaffiliated third parties, except in the following circumstances:

- as necessary to provide the service that the client has requested or authorized, or to maintain and service the client's account;
- as required by regulatory authorities or law enforcement officials who have jurisdiction over MVM, or as otherwise required by any applicable law;
- to protect the confidentiality or security of the financial institution's records against fraud and for institutional risk control purposes; and
- to provide information to the firm's attorneys, accountants and auditors or others determining compliance with industry standards.

Employees are prohibited, either during or after termination of their employment, from disclosing NPI to any person or entity outside MVM, including family members, except under the circumstances described above. An employee is permitted to disclose NPI only to other employees who need to have access to such information to deliver our services to the client.

Safeguarding and Disposal of Client Information

MVM restricts access to NPI to those employees who need to know such information to provide services to our clients.

Any employee who is authorized to have access to NPI is required to keep such information in a secure compartments or receptacle. All electronic or computer files containing such information shall be password secured and firewall protected from access by unauthorized persons. Any conversations involving NPI, if appropriate at all, must be conducted by employees in private, and care must be taken to avoid any unauthorized persons overhearing or intercepting such conversations.

Safeguarding standards encompass all aspects of the MVM that affect security. This includes not just computer security standards but also such areas as physical security and personnel procedures. Examples of important safeguarding standards that MVM may adopt include:

- access controls on customer information systems, including controls to authenticate and permit access only to authorized individuals and controls to prevent employees from providing customer information to

unauthorized individuals who may seek to obtain this information through fraudulent means (e.g., requiring employee use of user ID numbers and passwords, etc.);

- access restrictions at physical locations containing customer information, such as buildings, computer facilities, and records storage facilities to permit access only to authorized individuals (e.g., intruder detection devices, use of fire and burglar resistant storage devices);
- encryption of electronic customer information, including while in transit or in storage on networks or systems to which unauthorized individuals may have access;
- procedures designed to ensure that customer information system modifications are consistent with the firm's information security program;
- dual control procedures, segregation of duties, and employee background checks for employees with responsibilities for or access to customer information (e.g., require data entry to be reviewed for accuracy by personnel not involved in its preparation; adjustments and correction of master records should be reviewed and approved by personnel other than those approving routine transactions, etc.);
- monitoring systems and procedures to detect actual and attempted attacks on or intrusions into customer information systems (e.g., data should be auditable for detection of loss and accidental and intentional manipulation);
- response programs that specify actions to be taken when the firm suspects or detects that unauthorized individuals have gained access to customer information systems, including appropriate reports to regulatory and law enforcement agencies;
- measures to protect against destruction, loss, or damage of customer information due to potential environmental hazards, such as fire and water damage or technological failures (e.g., use of fire-resistant storage facilities and vaults; backup and store off site key data to ensure proper recovery); and
- information systems security should incorporate system audits and monitoring, security of physical facilities and personnel, the use of commercial or in-house services (such as networking services), and contingency planning.

Any employee who is authorized to possess "consumer report information" for a business purpose is required to take reasonable measures to protect against unauthorized access to or use of the information in connection with its disposal. There are several components to establishing 'reasonable' measures that are appropriate for the firm:

- assessing the sensitivity of the consumer report information we collect;
- nature of our advisory services and the size of our operation;
- evaluating the costs and benefits of different disposal methods; and
- researching relevant technological changes and capabilities.

Some methods of disposal to ensure that the information cannot practicably be read or reconstructed that MVM may adopt include:

- procedures requiring the burning, pulverizing, or shredding of papers containing consumer report information;
- procedures to ensure the destruction or erasure of electronic media; and
- after conducting due diligence, contracting with a service provider engaged in the business of record destruction, to provide such services in a manner consistent with the disposal rule.

Additional Privacy Information and Your Privacy Rights and Resources

Affiliate Use and Required Disclosures

We may share Personal Information and other user information among our affiliated companies to provide services you have requested or to offer new services or products to you.

In addition, we may disclose Personal Information to third parties when required by law, regulation or by court order.

How to Request Deletion of the Personal Information We Collect

MVM allows you to delete your account. You can call us for instructions on how to do so. We will retain information on deleted accounts as required for legal and security purposes.

Opt-out Information

If you request to be added to our Opt-out lists, we will keep your Personal Information on those Opt-out lists until you request to be removed from such lists. We allow you to Opt-out of the following:

- Promotional or Product Notification emails
- Advisor phone calls - notify your advisor at the time of the call to place you on the do not call list
- Physical Mailings - send your request to our support team to be added to Opt-out list

For opt-out requests, please find contact information under **“Privacy Questions, Comments or Feedback?”** below.

Email Records

MVM keeps business records, including emails you send to us, for five (5) years to meet our regulatory compliance requirements. This includes any email you send to our privacy, security or support teams.

Data Residency

Our services and data are hosted in the United States.

US State Residents Privacy Notices

To exercise any of your rights described below, please find contact information under **“Privacy Questions, Comments or Feedback?”** below.

Nevada Residents

We are providing you this notice under Nevada state law. You may be placed on our internal Do Not Call List by contacting us.

In addition to contacting us, Nevada residents can contact the Bureau of Consumer Protection, Office of the Nevada Attorney General, in writing at 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; by calling (702) 486-3132; or by emailing: BCPINFO@ag.state.nv.us.

Vermont Residents

Under Vermont law, we will not share any Personal Information we collect about Vermont residents with third parties, unless the law allows.

California Residents

Residents of California have the right to request a disclosure describing what types of Personal Information (if any) we have shared with third parties for their direct marketing purposes, and with whom we have shared it, during the preceding calendar year.

Protecting Children’s Privacy Online

MVM is not directed to individuals under the age of thirteen (13), and those children should not provide Personal Information through our websites or applications. We do not knowingly collect information from children under 13 without parental consent. For more information about the Children’s Online Privacy Protection Act (COPPA), visit the Federal Trade Commission [website](#).

Modifications to our Privacy Policy

We change our privacy practices from time to time as the need arises. When we do, we will revise this Privacy Policy and we will post the revised document on our website at www.mvmadvisors.com

When changes to this Privacy Policy are material, we will provide notice to Advisory Clients.

Privacy Questions, Comments or Feedback?

Please contact us*

Attention: Privacy Team
MVM Advisors LLC
7043 Terrace Ridge
Katy, TX 77494

Call US 281.810.2011

Visit www.mvmadvisors.com

Email us at compliance@mvmadvisors.com

**Note that the Privacy Team may not respond to automated requests or other requests that do not appear to be legitimate in nature.*