WEALTH, INC.

PRIVACY POLICY

***Date of Last Revision*: January 30, 2023**

Wealth, Inc. ("**Wealth**," "**we**," "**us**," or "**our**") has prepared this Privacy Policy to explain what personal information we collect, how we use and share that information, and your choices concerning our information practices. Through our website and mobile application, we provide self-help forms so you can prepare your estate planning documents, and we provide related tools and services to help our users take control of their financial lives (collectively, the "**Service**").

Before using the Service or submitting any personal information to the Wealth website, please review this Privacy Policy carefully and contact us if you have any questions. By using the Service, you agree to the practices described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Service.

Please review our GLBA Privacy Notice to learn more about our collection, use, and sharing of your financial information.

In certain cases we may act as a service provider of your personal information for a partner under a separate agreement ("partner"). Under those cases we treat all personal information covered by this Privacy Policy as pertaining to individuals acting as business representatives, and not in their individual or household capacity. For example, this Privacy Policy does not apply to our handling of personal information that we process on behalf of our banking partners as a service provider. When we are acting as a partner's service provider (or data processor), we will process personal information in accordance with the terms of our agreement with the applicable partner's lawful instructions. Please refer to the privacy policy (or privacy notice) of the applicable partner for information regarding the partner's privacy practices, choices and controls.

1. PERSONAL INFORMATION COLLECTION

Personal Information We Collect From You:

- **Account and Contact Information:** We collect your name, email address, phone number, and mailing address.
- **Estate Plan Information:** We collect information needed to prepare your estate planning documents, including your date of birth, information about your assets and how you want to distribute them, and the names, dates of birth, and contact information of your family members, beneficiaries, and trustees.
- **Identity Vault Information:** We collect information contained on the documents you upload to our digital document vault, such as your passport, birth certificates, and tax returns.

- **Financial Information:** Our payment processor(s) will collect the financial information necessary to process your payments, such as your payment card number and authentication details. Please note, however, that we store only a tokenized version of such information and do not maintain payment card information on our servers.

- **Communication Information:** We may collect information when you contact us with questions or concerns and when you voluntarily respond to questionnaires or surveys.

- **Social Media Information:** We maintain a social media presence on platforms like LinkedIn ("**Social Media Pages**"). When you interact with us on social media, we may receive personal information that you provide or make available to us based on your settings, such as your contact details. In addition, the companies that host our Social Media Pages may provide us with aggregate information and analytics regarding the use of our Social Media Pages.

Internet Activity Information: When you use the Service, we may automatically log the following information:

- **Device Information**: The manufacturer and model, operating system, browser type, IP address, and unique identifiers of the device you use to access the Service. The information we collect may vary based on your device type and settings.

- **Usage Information**: Information about how you use our Service, such as the types of content that you view or engage with, the features you use, the actions you take, and the time, frequency, and duration of your activities. We use Google Analytics, a web analytics service provided by Google LLC ("**Google**") to help collect and analyze Usage Information. For more information on how Google uses this information, click here.

- **Location Information:** We may derive a rough estimate of your location from your IP address when you visit our website. Depending on the choices you make when configuring the mobile application, we may also collect and maintain a history of your precise location information using WiFi and Bluetooth technologies, as well as your device identifiers and GPS coordinates (e.g., latitude/longitude). If you want to prevent the collection of your Location Information, please adjust your settings in your mobile device to limit the mobile application's access to your Location Information.

- **Email Open/Click Information:** We may collect information about the date and time you open an email or click on any links in the email.

We may use the following technologies to collect Internet Activity Information:

- **Cookies**, which are text files stored on your device to uniquely identify your browser or to store information or settings in the browser to help you navigate between pages efficiently, remember your preferences, enable functionality, help us understand user activity and patterns, and facilitate online advertising.

- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.

- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

Personal Information We Collect from Third Parties and Publicly Available Sources: We may collect information relating to the assets you link to the Service, such as the balance in your financial accounts or the estimated value of your home, through our integrations with third party service providers. If you access the Service through your employer, your financial advisor, your certified public accountant, the trustee of your trust, or other advisor acting in a professional capacity, we may also receive personal information from that person. We may also collect information from our business partners with whom we engage in joint marketing, and from publicly available sources, such as property records relating to your home.

2. PERSONAL INFORMATION USE

We use your personal information for the following purposes:

Service Delivery, including to:

- provide, operate, maintain, and secure the Service;

- create, maintain, and authenticate your account;

- prepare your estate planning documents;

- facilitate intake procedures with an attorney with whom you are choosing to consult through the Service;

- facilitate the signing, witnessing and acknowledgment by a notary public of your estate planning documents; and

- process transactions through our third party payment processors.

Communicating with You, including to:

- send you insights and other information to keep your estate and financial plans up-to-date and responsive to changes in law;

- send you updates about administrative matters such as changes to our terms or policies; and

- provide user support, and respond to your requests, questions, and feedback.

Service Improvement, including to:

- improve the Service and create new features;
- personalize your experience; and
- create and derive insights from de-identified and aggregated information.

Marketing and Advertising, including for:

- **Direct Marketing:** To send you marketing communications as permitted by law, including, but not limited to, notifying you of special promotions, offers, and events via email and other means; and
- **Interest-Based Advertising:** We engage advertising partners, including third party advertising companies and social media companies, to display ads on the Service and other online services. These companies may use cookies and similar technologies to collect Internet Activity Information over time across the Service, our communications, and other online services, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to similar users (known as a “lookalike audience”) on other online platforms. You can learn more about your choices for limiting interest-based advertising in the Limit Online Tracking section below.

Compliance and Protection, including to:

- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- Protect our, your or others’ rights, privacy, safety or property (including by making and defending legal claims);
- Audit our compliance with legal and contractual requirements and internal policies; and
- Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

3. PERSONAL INFORMATION SHARING

We do not sell, rent, license, or lease your personal information to third parties. However, we may share personal information with:

- **Our Referring Partners:** Such as your employer, employee benefit marketplace, accountant, or financial advisor. We will share your name and the plan name that you selected with the partner who referred you so that the partner can keep track of who has created a Wealth account for statistical purposes. If your Wealth account is associated with an advisor account, we will share such other information as you have permitted through your own account settings, including, but not limited to, the status of your drafting of certain estate planning documents, the content of Wealth-generated drafts or executed documents, documents in your Wealth digital vault, and other data.

- **Service Providers:** Including hosting, email, advertising and marketing services, payment processors, notary services, customer support services, and analytics services. We take commercially reasonable steps to ensure our service providers adhere to the security standards we apply to your personal information.
- **Professional and Trustee Advisors:** Such as lawyers, trustees, accountants, and other advisors at your direction where doing so is necessary to facilitate the services they render to you.
- **Business Transaction Recipients:** Such as counterparties and others assisting with a merger, acquisition, financing, reorganization, bankruptcy, receivership, dissolution, asset sale, or similar transaction, and with a successor or affiliate as part of or following that transaction.
- **Government Authorities:** We do not volunteer your personal information to government authorities or regulators, but we may disclose your personal information where required to do so for the Compliance and Protection purposes described above.

When you use our Service, you may also share personal information with:

- **Emergency Access Contacts, Fiduciaries and Agents:** you may choose to direct Wealth to share information in your Wealth account with persons whom you designated as Emergency Access Contacts (*i.e.*, two trusted contacts whom you authorize to receive certain information from your Wealth account in the event you become incapacitated or pass away) or with persons whom you designate as executors, trustees, guardians, agents or in other trusted roles in your estate plan. We will take steps to verify your incapacity before sharing your information with your designated contacts.
- **Trusted Advisors:** such as your financial advisor or accountant. You may choose to share information with your advisors through your Wealth account to make it easier for your advisors to access your information and assist you.

4. PERSONAL INFORMATION RETENTION

We keep personal information until we no longer need it to satisfy the purposes described in this Privacy Policy and we have no legal obligation to keep it.

5. PRIVACY RIGHTS

To the extent personal information is not subject to our GLBA Privacy Notice and subject to any other applicable exceptions, depending where you reside, you may have the following rights:

- **Know.** You can request to know the categories of personal information that Wealth has collected about you, the business purpose for collecting your personal information, the categories of sources from which the personal information was collected, whether Wealth has disclosed your personal information for business purposes, the categories of personal information so disclosed, and the categories of third parties to whom we have disclosed your personal information (we provide this information in the Personal Information Collection, Use, and Sharing sections above);

- **Access.** You can request access to the specific pieces of personal information that Wealth has collected about you;

- **Delete.** You can request that we delete the personal information we collected from you; and

- **Correction.** You can request that Wealth correct personal information that is inaccurate or out of date.

- **Opt out.** You can instruct businesses that sell your personal information to stop doing so – Wealth, however, does not sell personal information.

If you would like to exercise any of these rights, or want an alternative form of this Privacy Policy, please contact us. After we receive your request, we may request additional information from you to verify your identity. Depending on your jurisdiction, you may be entitled to employer an “authorized agent” to submit requests on your behalf, although we may require the agent to present signed written permission to act on your behalf, and you may also be required to independently verify your identity with us and confirm that you authorized the agent to submit the request. We will not treat you differently for exercising your rights.

6. CHILDREN

Our Service is not directed to children who are under the age of 13. Wealth does not knowingly collect personal information from children under the age of 13. If we learn that we have collected personal information from a child under the age of 13 without the consent of the child’s parent or guardian as required by law, we will delete that information.

7. LINKS TO OTHER WEBSITES

The Service may contain links to other websites not operated or controlled by Wealth, including social media services (“**Third Party Sites**”). The information that you share with Third Party Sites will be governed by the specific privacy policies and terms of service of the Third Party Sites and not by this Privacy Policy. By providing these links we do not imply that we endorse or have reviewed these sites. Please contact the Third Party Sites directly for information on their privacy practices and policies.

8. SECURITY

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, we cannot guarantee the security of your personal information and you use the Service at your own risk.

9. YOUR CHOICES

- **Update or Correct Personal Information:** You can contact us and request any updates or corrections needed to keep your personal information accurate, current, and complete.

- **Opt Out of Marketing Communications:** You may opt out of marketing communications by following the unsubscribe instructions in any marketing email we send you. Please note, however, that you may continue to receive the communications described in the Communicating with You section after opting out of marketing communications.

Limit Online Tracking: Here are some of the ways you can limit online tracking:

- **Block Cookies:** Most browsers let you remove or reject cookies, including cookies used for interest-based advertising. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Use the following links to learn more about how to control cookies and online tracking through your browser:
    - Firefox; Chrome; Microsoft Edge; Safari

- **Limit the Use of Advertising ID:** You may be able to limit use of your mobile device's advertising ID for interest-based advertising purposes through your device's settings.

- **Use Privacy Plug-Ins or Browsers:** You can block our Service from setting cookies used for interest-based ads by using a browser with privacy features, like Brave, or installing browser plugins like Privacy Badger, DuckDuckGo, Ghostery or uBlock Origin, and configuring them to block third party cookies/trackers. You can also install a browser add-on to opt out of Google Analytics.

- **Advertising Industry Opt-Outs:** You can also use these opt-out options to limit use of your information for interest-based advertising by participating companies:
    - Digital Advertising Alliance
    - Network Advertising Initiative

- **Platform Opt-Outs:** The following advertising platforms offer opt-out features that let you opt out of use of your information for interest-based advertising:
    - Google opt-out

- LinkedIn opt-out
- Microsoft opt-out
- Pinterest opt-out

Note that the above opt-out mechanisms are specific to the device or browser on which they are exercised. You will need to opt out on every browser and device that you use.

Do Not Track. We currently do not respond to "Do Not Track" or similar signals. Learn more about "Do Not Track" here.

10. CHANGES TO THE PRIVACY POLICY

The Service and our business may change from time to time. As a result we may change this Privacy Policy at any time. When we do we will post an updated version on this page, unless another type of notice is required by applicable law. By continuing to use our Service or providing us with personal information after we have posted an updated Privacy Policy, or notified you by other means if applicable, you consent to the revised Privacy Policy and the practices described in it.

11. CONTACT US

If you have any questions about our Privacy Policy or information practices, please feel free to contact us at our designated request address: support@wealth.com or +1 (855) 456-0333.

GLBA Privacy Notice

FACTS	WHAT DOES WEALTH FINANCIAL TECHNOLOGIES, INC. ("WEALTH.COM") DO WITH YOUR PERSONAL INFORMATION?

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: ● Name and email address ● Financial account balance and asset information ● Identification documents

How?	All financial companies need to share consumers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their consumers' personal information; the reasons Wealth.com chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Wealth.com share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes — to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don’t share

For our affiliates' everyday business purposes — information about your transactions and experiences	No	We don’t share
For our affiliates' everyday business purposes — information about your creditworthiness	No	We don’t share
For our affiliates to market to you	No	We don’t share
For nonaffiliates to market to you	No	We don't share

Questions?	Contact us at legal@wealth.com.
Who we are	
Who is providing this notice?	This notice is being provided on behalf of Wealth.com.

What we do	
How does Wealth.com protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Wealth.com collect my personal information?	We collect your personal information, for example, when you ● Create an account with us or provide account information ● Give us your contact information or contact us with questions ● Use the Services We may also collect your personal information from other companies.

Why can't I limit all sharing?	Federal law gives you the right to limit only ● sharing for affiliates' everyday business purposes—information about your creditworthiness ● affiliates from using your information to market to you ● sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. ● Wealth.com doesn’t have any affiliates.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. ● Wealth.com does not share with nonaffiliates so they can market to you.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. ● Wealth.com doesn’t engage in joint marketing.

Other important information
California and Vermont Residents: we will not share personal information we collect about you except to the extent permitted under California and Vermont law, respectively.