

# Matson Money, Inc.

## Privacy Policy

---

How Matson Money, Inc. ("Matson Money") protects Account Owners' ("Account Owner") personal information:

Matson Money Inc. takes precautions – including administrative, technical, and physical measures – to safeguard personal information against loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction. We restrict access to Account Owners' personally identifiable financial information ("Nonpublic Personal Information") to employees who need to know that information to provide services to Account Owners. Matson Money also maintains physical, electronic, and procedural safeguards to protect Account Owners' Nonpublic Personal Information.

Integrity of Account Owners' personal information:

Matson Money has safeguards in place to keep Account Owners' information complete and up to date: Matson Money has proprietary software that provides the tools to review and update Account Owner information. No other software used at Matson Money can affect the Account Owner's account information. This software logs every change made to an account so that it has a paper trail for tracking and accountability. Only a select group of people have the ability to alter Account Owners' data. Website access is strictly read-only; no changes can be made via the website.

Technologies:

The Matson Money website that Account Owners may access, <http://www.MatsonMoney.com>, is a forced SSL site (meaning all traffic is encrypted) that does not allow the saving of login information. Matson Money requests the username and password upon each login. Matson Money maintains an integral difference between what is contained in the database and what Account Owner(s) and Authorized Representative(s) can access. Full database backups are performed every night. These backups are rotated on an abbreviated GFS scheme: translating into six tapes for daily backups, two tapes for weekly backups, and one tape for monthly backup. This is an industry standard approach modified for limited archival retrieval based on our constantly changing data. Backups are encrypted on both disk and tape using 168-bit encryption.

Company-wide commitment to privacy of Account Owners:

Matson Money does not sell Account Owners' personal information to anyone. Matson Money collects Nonpublic Personal Information from Account Owners from the following sources:

- Account applications and other formats, which may include an Account Owner's name, address, Social Security number, or other information about the Account Owner(s).
- Account Owner investment goals and risk tolerance.
- An Account Owner's professional advisors, such as an Account Owner's broker, financial planner, attorney, accountant, or an Authorized Representative who may provide financial or investment history and tax information about the Account.
- History of accounts including information about the transactions Matson Money has placed for Account Owner and balances in Account Owner's account(s).
- Correspondence, written or telephonic, between Account Owner and Matson Money or Account Owner's Authorized Representative, or custodian and Matson Money.

Matson Money does not disclose any Nonpublic Personal Information about the Account Owner to any entity that is not an affiliate of, or related by common ownership or affiliated by corporate control ("Unaffiliated Third Party") with, Matson Money except as permitted or required by law. Accordingly, Matson Money may disclose all of the information Matson Money collects about the Account Owner or the Account Owner's account(s), as described above, under the following circumstances:

- Matson Money receives an Account Owner's consent.
- Matson Money believes the recipient to be an Account Owner's Authorized Representative.
- The recipient is an Authorized Representative, custodian, or other service provider with whom Matson must share information in order to manage or service an Account Owner's account properly.
- The recipient is an Unaffiliated Third Party that performs marketing services on Matson Money's behalf.
- Matson Money is required by law to release the information to the recipient.

Matson Money will only use information about Account Owner and Account Owner's account(s) to:

- Service Account Owner's investment and financial needs.
- Manage and service Account Owner's account(s).
- Administer Matson Money's business.

Matson Money will adhere to the policies and practices described in this policy whether Account Owner is a current or non-current Account Owner of Matson Money.

Matson Money will not directly contact Account Owner to ask for Nonpublic Personal Information for Account(s).

- Any request or verification of Nonpublic Personal Information will be directed to an Authorized Representative.
- If Nonpublic Personal Information is requested by someone other than an Authorized Representative, Matson Money will verify Social Security number and date of birth of Account Owner prior to release of said information. This type of request would occur in the event Account Owner closes account(s) and assets are being transferred to a new investment firm.

## Matson Money, Inc.

### Privacy Policy

<b>FACTS</b>	<b>WHAT DOES MATSON MONEY DO WITH YOUR PERSONAL INFORMATION?</b>
--------------	--

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?	<p>The types of personal information we collect, and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>Social Security number and income</li> <li>Account balances and payment history</li> <li>Credit history and credit scores</li> </ul> <p>When you close your account, we continue to share information about you according to our policies.</p>
How?	All financial companies need to share customers' personal information to run their everyday business: to process transactions, maintain customer accounts, and report to credit bureaus. In the section below, we list the reasons for which financial companies can share their customers' personal information, whether Matson Money chooses to share this information, and whether you can limit this sharing.

Reasons we can share your personal information	Does Matson Money Share?	Can you limit this sharing?
For our everyday business purposes: to process your transactions, maintain your account, and report to credit bureaus.	Yes	No
For our marketing purposes: to offer our products and services to you.	No	We do not share
For joint marketing with other financial companies	No	We do not share
For our affiliates' everyday business purposes: information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes: information about your creditworthiness	No	We do not share
For our affiliates to market you	No	We do not share
For non-affiliates to market you	No	We do not share

Contact Us	<a href="http://www.MatsonMoney.com">www.MatsonMoney.com</a>
------------	--

## Matson Money, Inc.

### Privacy Policy

#### FACTS

#### WHAT DOES MATSON MONEY DO WITH YOUR PERSONAL INFORMATION?

Sharing Practices	
How often does Matson Money notify me about their practices?	We must notify you about our sharing practices when you open an account and each year while you are an Account Owner.
How does Matson Money protect my personal information?	To protect your personal information from unauthorized access and use, we utilize security measures that comply with Federal law. These measures include computer safeguards and secured files and buildings.
How does Matson Money collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"><li>- Open an account or deposit money</li></ul>
Why can't I limit all sharing?	Federal law gives you the right to limit sharing only for: <ul style="list-style-type: none"><li>- Affiliates' everyday business purposes – information about your creditworthiness</li><li>- Affiliates to market to you</li><li>- Non-affiliates to market to you</li></ul> State laws and individual companies may give you additional rights to limit sharing.

Definitions	
Everyday business purposes	The actions necessary by financial companies to run their business and manage Account Owner accounts, such as: <ul style="list-style-type: none"><li>- Processing transactions, mailing, and audited services</li><li>- Responding to court orders and legal investigations</li></ul>
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"><li>- Our affiliates include Matson Money, Inc. and McGriff Video Production, LLC.</li></ul>
Non-affiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"><li>- Matson Money does not share with non-affiliates so they can market to you.</li></ul>
Joint marketing	A formal agreement between non-affiliated financial companies that together, market financial products or services to you. <ul style="list-style-type: none"><li>- Matson Money does not jointly market.</li></ul>