

# **Fortress Private Ledger, LLC**

## **PRIVACY POLICY**

**Fortress Private Ledger, LLC  
3110 Edwards Mill Road, Suite 200  
Raleigh, NC 27612  
(919)322 2762  
<http://www.fortressfinancialpartners.com/>**

March 16, 2020

We believe that the privacy and security of your data are essential. This statement summarizes the policies and procedures Fortress Private Ledger, LLC ("The Company") has established to protect the privacy and security of the personal information you entrust to us.

- What personal information of mine is collected?

The Company collects information from you during your use of our service. If your retirement plan sponsor or administrator or other financial institution makes our service available to you, it may provide us with information about you and your account to facilitate our ability to provide our services to you and to reduce the amount of data you need to enter. The information we collect may include but is not limited to your name, age, salary, financial account information including financial institution, account balances and contributions, investment holdings and preferences, and contact information. We keep records of our advisory service, which may include but are not limited to records of the advice that we provide to you, your use of our services, and your communications to us about our services.

- How is my information used?

Your personal, investment information are maintained by the Company to provide you with your services and to fulfill our legal and regulatory requirements. The Company utilizes email as a primary source for communicating with you to notify you of information that is available that directly affects your account and your custom strategies. We also use email as a tool to notify customers of enhancements to products and services and new offers. It is your responsibility to ensure that you maintain a current email address with the Company, attend to it regularly, and notify us if there are any changes to be made to your email address.

- How is my information protected?

We follow specific policies and procedures to maintain the confidentiality of your personal information. We maintain extensive physical, electronic and procedural safeguards to protect your information.

- With whom is my information shared?

The Company will not sell, reveal or share any of your personally identifiable information to others except in the following limited circumstances:

1. We have your permission to share the information;
2. We need to share your information with companies who work on our behalf to provide a product or service to you or to maintain or service your account (for example with a financial institution to execute transactions, or with a mailing service company to send communications to you; unless we tell you differently, these companies do not have any right to use the personally identifiable information we provide to them beyond what is necessary to assist us); or
3. We are required or authorized by law to disclose your information (for example, to comply with a subpoena or regulatory requirement, or to protect against fraud or illegal activity).

- What are cookies and how are they used?

Cookies are small amounts of data that are sent to your browser from a Web server and stored on your computer's local storage. Our cookies do not contain any personally identifying information. Instead, the information they provide is in the form of aggregate statistics. They may be used to determine audience size, measure traffic patterns, analyze clickstreams, or help keep your session secure. If you do not wish to receive cookies, most Internet browsers allow you to turn cookies off so that you do not receive them. If you do turn your cookies off, you will not be able to use some services or features.

- How can I change my personal information?

You can change your personal information by logging into your Company online account. If you have any questions, please contact the Company.

- How will you notify me of changes in the use of my personally identifiable information?

If we are going to use your personally identifiable information in a manner different from that stated at the time the information was collected, we will notify you via e-mail, and you will have a choice as to whether or not we use your information in this way. In addition, if we make any material changes in our privacy practices that do not affect information we have already collected, we will post a prominent notice on our Web site notifying you of the change. In some cases, we will also notify you by e-mail of certain changes in our privacy practices. We will rely on the contact information that you, your plan sponsor or your plan administrator provides to communicate any notices to you regarding data in your account.

- Changes to Privacy Policy

The Company may change this policy from time to time without notice. Any changes to this policy will be promptly posted on this web site so we encourage you to refer back to this policy regularly. Your use of the Company's web site after any changes have been posted will constitute your agreement to the modified Privacy Policy. This privacy statement applies to individuals who are current, former, and prospective customers. Our site link s to other websites. The Company is not responsible for the privacy practices or content of these other websites.