



Privacy Policy - European Union's General Data Protection Regulation ("GDPR")
Effective Date: January 31, 2024

United Capital Financial Advisors, LLC ("United Capital," "we," "us" or "our") maintains physical, electrical, and procedural safeguards that comply with federal standards and the European Union's General Data Protection Regulation ("GDPR") to protect its clients' nonpublic personal information. This Privacy Policy describes our policies and procedures on the collection, use and disclosure of your information when you use the Service and tells you about your privacy rights and how the law protects you.

We use your personal data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy.

This Privacy Policy applies to information collected through our websites that link to this policy (the "Websites") which include: www.unitedcapitalwealth.com, guidecenter.finlife.com and hc.finlife.com; any of our mobile applications associated with the Websites or which link to this policy (the "Mobile Applications") which include GuideCenter and all of our other online offerings that post a link to this Privacy Policy, whether accessed via computer, mobile device, email or other technology or any associated content, material, or functionality contained on the Websites or Mobile Applications (together with the Websites and the Mobile Applications, collectively, the "Services"), as well as information collected from you offline in connection with the services we provide to you.

Definitions

- **"You"** or **"your"** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such an individual is accessing or using the Service, as applicable.
- **"Affiliate"** means companies related by common ownership or control.
- **"Including"** or **"includes,"** means "including but not limited to" or "includes but not limited."
- **"Personal Data"** or **"Personal Information"** is any information that relates to an identified or identifiable individual. For the purposes of the GDPR, Personal Data means any information relating to you such as a name, an identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

How and What Type of Personal Information We Collect

We may collect or generate personal information about you, or a third party acting upon your instruction, in various ways and from various sources depending on the Services and the relationship we have with you.

- Before you interact with us, we may collect data when we obtain information to identify marketing prospects from our affiliates and third parties.
- While applying, signing up, or otherwise establishing an account or engaging us to provide services, over the course of your relationship with us, you provide information directly to us and may give us permission to obtain it from third parties (such as your CPA, attorney, account custodian, other advisors, or websites with your information), and we may collect information about you from third parties such as data analytics providers, the public domain, credit reporting agencies, identity verification and fraud prevention services and government entities, and we also may generate new information about you.
- When you communicate, and interact with us over the phone and online, including via social media or other platforms, we may monitor and record the content of the communications, and collect information



about your use and interactions with the Services (such as via the mechanisms described in the “Cookies and Other Tracking Technologies” section below.

- In connection with our marketing and communications, we may collect digital information using cookies, web beacons, or similar tools that we and our Vendors and other third parties have set.
- When you interact with us via a social media platform, we may collect a copy of the posts and other information, such as account ID or username.

Below is a list of the categories of personal information, along with some descriptions and examples, that we may collect or generate through each of the processes described above:

- **Personal Identifiers:** This includes first and last name, address, email address, telephone number, identifiers assigned to you for our internal use, signature, photographs, and employee ID.
- **Device and Online Identifiers and Related Information:** This includes Internet Protocol address (“IP address”), account username/log-in, device information, device type, device identifier, and other device information.
- **Background Information:** This includes date of birth, gender, language, estimated retirement age, marital status, number of financial dependents, household income data, family information, vital records information, and any other information we are required to collect by law and regulation.
- **Financial Information:** This includes account number(s) and other information regarding accounts with us and at other financial institutions, your authority over, source of wealth information, investor qualifications, investment goals and experience, net worth and liquidity needs, income, credit scores, litigation and bankruptcy history, tax classification and information, and other information regarding your financial circumstances.
- **Government Identifiers:** This includes Social Security number, tax identification number, national identification number, other government-issued identification number (such as driver’s license, tribal card, passport, or alien registration number).
- **Protection Classification Characteristics:** This includes age, national origin, citizenship, nationality, marital status, ethnicity, association with senior political officials and/or executives of government owned enterprises.
- **Internet, Application, and Network Activity:** This includes data related to user activity (e.g., when and how you use the Services and interact with our communications including emails), browsing history, search and clickstream history, online website tracking information, other data related to user activity, and URL referral header information; we may collect this type of information automatically via cookies, pixels, browser web storage, web beacons and similar technologies.
- **Location Data:** This includes information about your geolocation and your mobile device including a unique identifier for your device; in addition, in some instances, location information can be estimated from your IP address or through your Wi-Fi connection.

Although you don’t have to supply any of the personal information we request, we may not be able to provide Services to you if you do not.

Personal information does not include information that has been anonymized or aggregated so that it does not identify an individual.



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How We Use Personal Information

We collect and use personal information for the following business purposes:

- Administering, operating and managing your relationship with us
- Understanding your needs and offering services to you
- Complying with contractual obligations, relevant industry standards, and our policies
- Authenticating identity
- Mitigating fraud and enhancing the security of our services
- Contacting and communicating with you, including through push notifications and text messages
- Conducting marketing activity
- Responding to and reviewing social media messages or postings about us or our services
- Presenting third-party products and services we think may be of interest
- Performing analytics concerning the use of the Services, including responses to our emails and the pages and advertisements that are viewed
- Operating, evaluating and improving our business and our Services
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We may also use your personal information for any other purpose that we disclose at the time you provide, or when we collect your information, and other purposes permitted by applicable law.

We may also use data that we collect on an aggregate or anonymous basis for various business purposes, where permissible under applicable laws and regulations.

If your relationship with us ends, we will continue to treat your personal information as described in this Privacy Policy or as set forth in the applicable privacy notice.

To Whom We Disclose Personal Information

We disclose personal information as set forth below:

Creative Planning affiliates: We may disclose personal information to members of the Creative Planning family of companies in order to service accounts, improve services or for other purposes permissible under applicable laws and regulations.

Vendors: We may disclose personal information to non-affiliated companies and partners that perform support services for us, such as data analytics, fraud analysis, identity verification, risk management, security services, advertising and marketing, customer support, mail services, email delivery, information technology, and payment processing.

Legal process and emergency circumstances: We may disclose personal information to third parties as permitted by, or to comply with, applicable laws and regulations. Examples include responding to a subpoena or similar legal process, protecting against fraud and cooperating with law enforcement or regulatory authorities. We may also disclose information if we believe it is necessary or appropriate to protect our rights, property or safety, or the rights, property or safety of our employees, customers or others, or to enforce our contractual rights.

Corporate Transactions: In the event of a corporate transaction, such as a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of any or all of our assets or liabilities, some of the personal



information that we hold may be among the assets or liabilities transferred to a buyer or other successor. We may also transfer personal information to another entity or its affiliates or service providers in connection with, or during negotiations of, any merger, acquisition, sale of assets or liabilities or any line of business, change in ownership control or financing transaction.

We also may disclose personal information to others where permissible under applicable laws and regulations or when you provide your consent or direction.

How We Store Your Data

United Capital securely stores your data both electronically and, in some cases, physically. Any physical personal information we have, i.e. paperwork, we strive to have it scanned in and then shredded to reduce the number instances that we store your personal data.

Your Rights and Limits to Sharing

United Capital would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – you have the right to request copies of your personal data. We charge a fee for this service.

The right to rectification - you have the right to request us to correct any information you believe is inaccurate. You also have the right to request us to complete information you believe is incomplete.

The right to erasure – you have the right to request that we erase your personal data, under certain conditions.

The right to restrict processing – you have the right to request that we restrict the processing of your personal data, under certain conditions.

The right to object to processing – you have the right to object to our processing of your personal data, under certain conditions.

The right to data portability - you have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

To the extent that U.S. Federal laws apply to your Personal Data, you have the right to limit only;

- Sharing for affiliates everyday business purposes;
- Affiliates from using your data to market to you; and
- Sharing for nonaffiliates to market to you.

United Capital may take steps to verify your identity before granting you access to your Personal Data.

Lawful Basis to Process Your Personal Information

We may process your Personal Data in one or more of the following lawful basis: (1) you voluntarily consent to provide us your personal information in connection with our Services; (2) as necessary to fulfill certain contractual obligations; (3) as necessary to comply with applicable rules, laws, and regulations; and (4) as necessary for purposes of our legitimate interest of United Capital and/or a third party.



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How We Protect Information

We take the security of personal information seriously and work to limit access to 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 disclosures while in our possession.

Retention of Personal Information

We retain personal information for varying time periods depending on our relationship with you and the status of that relationship. When determining how long to keep personal information, we take into account our legal and regulatory obligations and our legitimate business interests (such as, managing the Services, preventing fraud, responding to regulatory or supervisory inquiries, and establishing, exercising or defending legal claims, disputes or complaints).

Cookies and Other Tracking Technologies

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

"Web Beacons", also known as an Internet tags, pixel tags or clear GIFs, are a type of technology placed on a webpage or in an email. They are generally used to transmit information back to a web server.

We and our vendors use tracking technologies such as cookies, web beacons, session replay, device advertising IDs and similar technologies on the Services for a number of business purposes, such as to monitor our advertising, remember your preferences, personalize your experience, understand how you use and interact with the Services, suggest products tailored to you, for security purposes, to improve the Services, and for marketing campaign performance assessment. These technologies collect information about your browser/device and your use of the Services, such as the time/date of access and time spent on the Services, pages visited, language preferences, whether you open our emails, and other traffic data. You may be able to configure your web browser to decline cookies and/or configure your email client not to load web beacons in emails. Please note that, if you choose to decline cookies, certain features of the Services may not function properly or may not be accessible to you. Please see the "Interest-Based Advertising" and "Do Not Track" sections below for information on the choices we provide regarding Cookies, Web Beacons, and other tracking technologies.

Interest-Based Advertising

Interest-based advertising refers to collecting information about your online activities over time and across different websites, devices, and other online services to deliver advertisements based on online activity. We use interest-based advertising to deliver advertisements and other targeted content to you, including through third-party advertising partners which we may permit to track your visits to the Services. These third parties may use these technologies to collect information about you when you use the Services using the technologies described above. These third parties may collect information about your online activities over time and across different websites and other online services.

Some of the third parties advertising partners that place tracking tools on the Services may be members of organizations or programs that provide choices to individuals regarding the use of their browsing behavior for purposes of targeted advertising. Some of our ads that are displayed on third-party websites will feature an



AdChoices icon inside the ad. Clicking on the AdChoices icon inside the ad will provide you an opportunity to opt out of interest-based advertising by the third parties that participate in the program. In addition, you can learn more about the options available to limit these third parties' collection and use of your information on our websites by visiting: (i) [opt-out page](https://www.unitedcapitalwealth.com/privacy-choices/), <https://www.unitedcapitalwealth.com/privacy-choices/>; (ii) and the websites for the [Network Advertising Initiative](https://optout.networkadvertising.org/), https://optout.networkadvertising.org, and the [Digital Advertising Alliance](https://optout.aboutads.info/), https://optout.aboutads.info. Users of our mobile applications may install the Digital Advertising Alliance's AppChoices mobile app, available [here](https://youradchoices.com/appchoices/), https://youradchoices.com/appchoices, and choose to opt out of participating advertising networks' use of mobile app activity for interest-based advertising purposes.

If you choose to opt-out via the web-based tools, a cookie will be placed on your browser indicating your decision. This cookie is specific to a particular device and browser, so if you use different browsers or devices, you will need to opt-out on each browser or device. In addition, because the opt-out is facilitated via cookies, if you clear your cookies you will need to opt-out again. Likewise, mobile app opt-outs via AppChoices are based on your mobile device's advertising identifier, so if you reset it, you will need to opt-out again via AppChoices.

Do Not Track

We do not respond to the "Do Not Track" browser-based signal. However, our websites are designed to support the Global Privacy Control, described at <https://globalprivacycontrol.org/> which you can enable by downloading a participating browser or browser extension.

Additional Technology

We use Google Analytics, a web analytics service provided by Google, Inc. ("Google"), on the Services. Google Analytics uses cookies or other tracking technologies to help us analyze how users interact with and use the Services, compile reports on the Services' activity and provide other services related to Services' activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a return visitor and any referring website. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's privacy policies. To learn more about Google's partner services and to learn how to opt out of tracking of analytics by Google, click <https://www.google.com/policies/privacy/partners/>.

We may use Google Maps API and Places API features and content, for example to help auto-complete address information on the Service. By using the Service, you agree to be bound by the then-current Google Maps/Google Earth Additional Terms of Service and Google Privacy Policy. To learn more about Google Maps/Google Earth Additional Terms of Service and the Google Privacy Policy, please visit https://maps.google.com/help/terms_maps/ and <https://www.google.com/policies/privacy/>, respectively.

We use Adobe Analytics, a web analytics service provided by Adobe on the Sites. Adobe Analytics uses cookies or other tracking technologies to help us analyze how users interact with and use the Sites, compile reports on the Sites' activity and provide other services related to Site activity and usage. The technologies used by Adobe may collect information such as your IP address, time of visit, whether you are a return visitor and any referring website. The information generated by Adobe Analytics will be transmitted to and stored by Adobe and will be subject to Adobe's privacy policies. To learn more about Adobe's services and to learn how to opt out of tracking of analytics by Adobe, visit <https://www.adobe.com/privacy/policy.html>.



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Unsubscribe/Contact Us

If you decide at any time that you no longer wish to receive marketing emails from one of our lines of business, please follow the "unsubscribe" instructions provided in such emails. Please note that even if you unsubscribe, we may continue to send transactional or administrative emails, such as legally required, regulatory, billing, or service notifications. Your device settings may provide functionality to control push notifications that we may send.

If you need to contact us for more information about our Privacy Policy and practices, or because you have questions, concerns, or want to exercise one of your rights, you may do so using the information listed below:

By phone: (800) 796-3315

By mail:

United Capital Advisors, LLC

ATTN: Privacy

125 John Carpenter Freeway

Suite 1300

Irving, TX 75062

Subject to applicable law, if you communicate with us by telephone, we may monitor and may record the call.

Updates to this Privacy Policy

We may change this Privacy Policy from time-to-time. If we make changes to this Privacy Policy, we will update the "Effective Date" and post to <https://www.unitedcapitalwealth.com/privacy-policy/>. Changes to this Privacy Policy will become effective when posted unless indicated otherwise. Your continued use of the Service following the posting of any changes will mean that you accept those changes.