



PRIVACY POLICY

To Our Clients and Prospective Clients

At Dvdend LLC ("Dvdendo") we are proud of our privacy practices and want you to know how we protect your personal information and use it to establish and maintain your account.

First and Foremost, we are committed to maintaining the confidentiality, integrity and security of your personal information. You benefit from this privacy protection automatically, whether you are an existing, prospective or former client. We are committed to providing you with superior service and in doing so, protecting the nonpublic information we have collected. We will **never** rent, sell or trade your personal information to anyone. Ever

Please be aware that you do not have to contact us to benefit from our privacy protections; they apply automatically to all our clients.

Should you have any questions regarding the privacy of your personal information, please contact us at 1-844-DVDENDO or by email to support@dvdendo.com

Thank you for the trust you are placing in us.

Dvdendo
120 SW 8th Street
Miami, FL 33130
Tel: 1-844-DVDENDO

Introduction

Dvdend, LLC ("Dvdendo") operates an automated investment service ("Service"). Our Service is made available through our website and via applications that reside on mobile devices. This Privacy Policy describes how Dvdendo treats your Personal Data when you use or evaluate our service.

For the purpose of this agreement a *User* is an individual who uses our website or mobile application to evaluate our service, or for educational purposes and a *Client* is an individual who signs our Client Agreement that entitles the Client to have her or his investment portfolio managed by Dvdendo. Our Privacy Policy, Terms of Use and where applicable Client Agreement collectively governs your use or evaluation of our service.

Information Collection

The types of information we collect depend on whether you are a User or Client. We collect Personal Data from you when you voluntarily provide information to us. Examples of instances when we collect Personal Data include when you answer questions on our website or in our mobile application(s) to determine what kind of portfolio we might recommend if you were to become a Client, when you register to open an account, when you contact our client service organization with questions or when you become a Client. Wherever Dvdendo collects Personal Data, we make an effort to link to this Privacy Policy and other relevant terms, such as our Terms of Use.

Information Collection from Users

We collect personal information such as name, address, telephone number and other optional information you may provide, such as your age, investable assets, and risk tolerance, which may include your financial goals and objectives, income information and other financial planning information about your household. We may also collect your e-mail address and/or telephone number should you opt to engage via our website, mobile app, email or dedicated telephone number with our client service team.

Information Collection from Clients

If you choose to become a Client, in addition to the information we collect from you as a User, as described above, we will ask you for certain information, including, but not limited to, your full legal name, contact information, birth date, Social Security Number, citizenship, investment objectives, approximate net worth, and other regulatory disclosures that may be necessary and required under Federal and certain statutory law (see our Client Agreement).

We also collect account numbers and login credentials for the accounts (bank or brokerage) you choose to link to our Service, any challenge and/or security questions associated with those accounts and any information contained in those accounts.

In General

Dvdendo's servers automatically record certain information ("Non-Identifiable" or "Aggregated Data") about your use or evaluation of our Service. Similar to other technology platforms and services, Dvdendo records information such as browsing activity, data displayed or clicked on (such as UI elements, ads, and links), and other information (such as browser type, IP address, date and time of access, cookie ID, and referrer URL). Along with cookies, Dvdendo may also use third-party tracking technology, such as Google Analytics, to record similar information

regarding you and your activity on the Site.

Use of Information

Dvdendo stores, processes, and maintains data related to you in order to provide client support, offer new products or services and provide our Service to Clients in accordance with the rules of regulatory bodies such as the State of Florida, the Securities and Exchange Commission and FINRA. You may choose not to provide such information to us, but if you choose not to provide such information, you will not be able to become a Client.

We may share the information required to become a Client with our brokerage partner solely for the purpose of allowing our brokerage partner to provide services to you.

Dvdendo may use your Personal Data to communicate with you regarding our Service or to tell you about blog posts or services that we believe will be of interest to you. If you decide at any time that you no longer wish to receive marketing communications from us, please follow the "unsubscribe" instructions provided in the communications. Please note that you cannot opt-out of administrative communications such as regulatory, billing or service notifications.

Information Sharing and Onward Transfer

We will not sell, rent, or trade your Personal Data with any third parties except as required by law, such as when we reasonably believe it is necessary or appropriate to investigate, prevent, or take action regarding illegal activities, suspected fraud, front running or scalping, situations involving potential threats to the physical safety of any person, or violations of our Terms of Use.

There are certain circumstances, outlined below, in which we may share your Personal Data without further disclosure to you. From time-to-time we hire other companies to perform certain business and technology related functions (e.g. mailing information, database maintenance and payment processing). In the case we hire another company to perform a function of this kind, we only provide them with the minimum information they need to perform their specific function. Dvdendo maintains strict physical, electronic and procedural safeguards that comply with federal standards to guard your non-public personal information.

Except as required by law or requested by regulatory authorities, Dvdendo agrees to maintain your non-public Personal Data in strict confidence.

Your Choices and Obligations

You may request deletion of personal information by emailing support@dvdendo.com and providing us enough information to identify your account and prove that you are the owner of the identified account. We will endeavor to make any deletion request effective as soon as reasonably practicable. However, we may retain residual information related to your account, as well as any data related to your trades, in accordance with applicable laws. In no case will we share any individual trading data unless required by regulators or other government bodies.

You may decline to provide personal information to Dvdendo. Declining to provide personal information may disqualify you for Dvdendo services and Site features that require certain personal information.

Advertising

We do not allow third party advertising on our Website or Mobile applications.

Social Media and Links to Other Web Sites and Apps: "Third Parties"

This Privacy Policy and these terms apply only to Dvdendo operated services and applications. This Site may contain links that access other web sites and apps that are not operated or controlled by Dvdendo. The policies described herein do not apply to Third Party websites or applications.

Cookies and Pixels

Like many websites Dvdendo utilizes cookies and pixels.

What are Cookies and Pixels?

A cookie is a piece of data stored on a user's computer or mobile device containing information about a user's use of a website. Cookies are often combined with pixels to measure viewing of webpage. The use of a cookie and/or pixel may result in the storing of personal information such as the website visited immediately prior to Dvdendo. This information is primarily utilized by Dvdendo towards targeting future changes to its website in an effort to enhance the overall customer online experience. Cookies/pixels also provide Dvdendo with valuable information and tracking of website visitor usage which is utilized to assess and target future advertising or marketing by Dvdendo.

As explained below, we may use cookies in order to enhance the overall website experience, efficiency, as well as to provide information to us:

- 'Session based' cookie. This is essential for parts of the website to operate and has already been set. It is used to maintain the state of a user's actions

so as not to constantly request the same information from them within a 'session'.

- 'Remember me' cookie. This is a permanent cookie which can remember who you are once you have logged into the website so you are not asked to log in again for future visits. You will be asked for your consent before agreeing to the use of this function.
- 'Analytics' cookie. This is used to collect information about how you use our site, such as where you have come to the site from and which website pages you have visited. We use the information to help us improve the website.

Please note the use of cookies and pixels, while targeted at enhancing Dvdendo's existing and future website development and overall offering such items are not mandated for website functionality. Therefore, users are not required to accept any cookies or pixels to use Dvdendo's website. However, if the use of cookies or pixels is not accepted certain aspects of Dvdendo's website may be less accessible.

How can I disable cookies?

Although the majority of browsers are set up to accept cookies you are able to set your browser to refuse all cookies or indicate when a cookie is being sent. Please note that if you do set your browser to refuse cookies you may not be able to take full advantage of some of the features of our web site, and you may be required to acknowledge certain disclaimers each time you navigate between pages within the web site.

Minors

Dvdendo is not to be used by anyone under the age of 18 and, as such does not knowingly collect Personal Data from anyone under the age of 18. If you are under the age of 18, please do not submit any Personal Data to Dvdendo. If a parent or guardian becomes aware that his or her child under the age of 18 has provided us with personally identifiable information without his or her consent, he or she should contact us at support@dvdendo.com and we will delete such information from our files.

Other

This Privacy Policy may change from time to time. We will post any Privacy Policy changes and, if the changes are substantial, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes). Each version of this Privacy Policy will be identified at the top of the page by its effective date.

This document constitutes Dvdendo's complete Privacy Policy for Dvdendo and the Services.

If you have questions or comments about this Privacy Policy, please email us at support@dvdendo.com, by phone at 1-844-DVDENDO or via physical mail at:

Dvdendo
120 SW 8th Street
Miami, FL 33130