



Privacy Policy

MATSON MONEY, INC.

MATSON CAPITAL LLC

Matson Money, Inc. and Matson Capital LLC (“Matson”) consider customer privacy to be a fundamental aspect of their relationships with Account Owners and are committed to maintaining the confidentiality, integrity and security of its current, prospective and former Account Owners’ non-public personal information. Matson has developed policies that are designed to protect this confidentiality, while allowing Account Owner needs to be served.

Obtaining Non-Public Personal Information

In the course of providing Account Owners with products and services, Matson may obtain non-public personal information about Account Owners, which may come from sources such as: account applications and other forms; other written, electronic or verbal correspondence; Account Owner transactions; an Account Owner’s brokerage or financial advisory firm; financial professionals or consultants; and/or from information captured on applicable websites.

Information Collected from Websites

Matson or its service providers and partners may collect information from Account Owners via websites they maintain. The information collected via websites maintained by Matson or its service providers includes client non-public personal information.

Sharing Information with Third Parties

As a matter of policy, Matson does not disclose any non-public personal information provided by Account Owners or gathered by Matson to non-affiliated third parties, except as required or permitted by law, or as necessary for such third parties to perform their agreements with respect to Matson. As is common in the industry, non-affiliated third parties may from time to time be used to provide certain services, such as preparing and mailing reports, account statements and other information to Account Owners. Matson or its affiliates may also retain non-affiliated third parties to market services or products and may enter into joint marketing arrangements with them and other companies. These third parties may have access to an Account Owner’s personal and account information but are permitted to use this information solely to provide the specific service or as otherwise permitted by law. Matson may provide personal and account information to the Account Owner’s respective brokerage or financial advisory firm and/or financial professional or consultant.

Matson reserves the right to disclose or report Account Owner personal or account information to non-affiliated third parties where Matson believes in good faith that disclosure is required under law, to cooperate with regulators or law enforcement authorities, or to protect its rights or property. In addition, Matson may disclose information about an Account Owner or an Account Owner’s accounts to a non-affiliated third party at the Account Owner’s request or with the consent of the Account Owner.

Sharing Information with Affiliates

Matson may share Account Owner information with its affiliates, including in connection with servicing Account Owner’s accounts, and subject to applicable law, may provide Account Owners with information about products and services that Matson or its affiliates believe may be of interest to such Account

Owners. The information that Matson may disclose may include, for example, a Account Owner's participation in investment programs sponsored by Matson or an affiliate, an Account Owner's ownership of certain types of accounts (such as IRAs), information about Matson's experiences or transactions with an Account Owner, information captured on applicable websites, or other data about an Account Owner's accounts, subject to applicable law. Matson's affiliates, in turn, are not permitted to disclose Account Owner information to non-affiliated entities, except as required or permitted by law.

Procedures to Safeguard Private Information

Matson takes seriously the obligation to safeguard customer information, including Account Owner non-public personal information. Access to systems and databases containing customer information is restricted to personnel of Matson who need such access to perform their duties. Physical, electronic and procedural safeguards are in place to guard customer information, including an Account Owner's non-public personal information.

Changes to the Privacy Policy

From time to time, Matson may update or revise this privacy policy. If there are changes to the terms of this privacy policy, documents containing the revised policy on the relevant website will be updated.

