

# Cornerstone Investment Services Online Privacy Policy

*Last Updated January 18, 2019*

## **Commitment to privacy**

The protection, privacy and security of your personal information is a trust Cornerstone Investment Services takes very seriously. Protecting the confidentiality and security of personal information has always been an integral part of how we do business. This policy summarizes how we deal with personal information we collect about you.

This Privacy Policy covers Cornerstone Investment Services, LLC, a registered investment advisor, and Cornerstone Plan Sponsor Consultants. These entities are collectively referred to as “CIS,” “we,” “us” and “our” throughout this privacy policy. This privacy policy applies to individuals who visit our websites, either client or not. While our websites link to other websites, we are not responsible for the privacy practices or content of those other websites.

Your use with our websites, mobile application and emails will signify your consent to these practices, so please read the Privacy Policy carefully.

## **What personal information is collected?**

Depending on how you use our websites will determine the data collected about you. We use a 3<sup>rd</sup> party to collect the data and do analysis on our behalf. They are bound by the same privacy rules as we are and are not allowed to share the data. The information may include:

- Information you may provide - your name, age, salary, investment holdings and preferences, and contact information when filling out an online form;
- Information about your use of our website and your emails to us;
- Information about your transactions with third parties, such as changes to investment holdings and contribution rates;
- Information from third parties (*e.g.*, your retirement plan sponsor or administrator or other financial institution that makes our service available to you), such as your financial account information including financial institution, account balances and contributions, name, age, salary, contact information and investment holdings; and
- Information you provide when you request literature or information about our services.

Our 3<sup>rd</sup> party service providers may collect certain information through automated means. This can happen when you are on our website, using a mobile app or reading our emails. This is done through “Cookies” or other similar technologies. As stated above, CIS uses a 3<sup>rd</sup> party contracted service provider to manage and collect information from the cookies.

## **You do not have to provide personal information to access our websites or mobile application.**

Just visiting our websites and browsing through the information will normally not require that you disclose any personal information such as your name, email or account information. To access our secure website, to view your account, you will be issued a Username and Password. When filling out form for more information, you will have to disclose your name and email and other personal information.

## **How do we use your personal information?**

Your information is used by us to:

- Provide you with services
- To determine the effectiveness of advertising and content
- To inform you of our new features or services you may be interested in
- To fulfill our legal and regulatory requirements.
- To improve the website and content
- To deliver marketing communications to you that may be of interest to you.

By having more information about you, we are better able to make our website a more enjoyable and user-friendly experience.

If you participate in voluntary surveys, webinars or user research which you may receive from CIS, any information you provide will be handled in the manner specified in connection with such survey, webinar or research.

### **How is your personal information protected?**

CIS has specific policies and procedures to maintain the confidentiality of your personal information through physical, electronic and procedural safeguards. Personal information is restricted to those employees with a business need to know such information.

### **How is your personal information shared with unaffiliated third parties?**

We do not share or sell your personal information to unaffiliated 3rd parties for use in marketing their products or services. We do not sell information about clients and non-clients to anyone. We may share your personal information with unaffiliated third parties in the following limited circumstances:

- We have your permission; or
- With companies who work on our behalf to provide our products or services to you, or to maintain or service your account; or
- We are required or authorized by law to disclose your information (ie: subpoena or regulatory requirement, or to protect against fraud or illegal activity).

We require that our service providers agree to keep your personal information confidential and use it only for the specific purpose for which we provide it to them.

### **Sharing your personal information our affiliated companies.**

For everyday business purposes, we may share personal information about you with our affiliated companies, but, our affiliated companies are not permitted to use this information to market their products or services to you. Also, we do not share information with our affiliated companies regarding your creditworthiness.

Please see our [Privacy Policy](#) more information.

### **Privacy Online**

When you visit our websites and mobile application or reading our emails, we treat your personal information in the same way as described previously. The following information describes our policies regarding cookies, “do not track” signals, interest-based advertising and third-party analytics.

### **Cookies and similar technologies**

We and our third-party service providers may use cookies, web beacons (also known as a pixel tag or clear gif) and similar technologies on our websites, in our mobile application and in email messages. Cookies are small amounts of data that are sent to your internet browser from a web server and stored on your computer’s local storage. Cookies help us collect information about visitors to our websites, including date and time of visit, web pages viewed, amount of time spent on our websites or general information about the device used to access our websites. Our cookies and similar technologies do not contain any personally identifying information.

The information they provide may be used for various purposes, including creating aggregate statistics, determining audience size, measuring traffic patterns, analyzing clickstreams, helping keep your session secure, and providing relevant advertisements. 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.

### **Do we honor “do not track” signals?**

Some internet browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. How browsers communicate the “Do Not Track” signal is not yet uniform. For this reason, our websites do not have the ability to respond to “Do Not Track” signals.

### **Interest-based advertising and third-party analytics**

We may advertise our products and services on our websites and on websites not affiliated with us. We may contract with third-party advertising companies and social media companies to display these ads, and they may use cookies and similar technologies to optimize the placement of our ads. When we hire third-party online advertising companies, they may provide you with advertisements about our products and services that may be relevant to your interests, as determined, for example, by your activity on our websites or in our mobile application, or your interaction with our emails. Such advertisements are known as "interest-based advertisements." We do not control the opt-out mechanisms of these third party ad partners. To avoid tracking by these third party ad partners, you may

be able to change your browser settings to reject third-party cookies or add a plug-in to your browser to enable a Do Not Track feature – though we have no control over and cannot confirm whether these third parties honor the Do Not Track browser signal. For social media companies, you may be able to adjust your privacy settings to opt-out of interest-based advertisements. Additionally, many advertising companies are members of the Network Advertising Initiative (NAI) or the Digital Advertising Alliance (DAA) which provide opt-outs for member companies at [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices) or [www.aboutads.info/choices](http://www.aboutads.info/choices).

We use Google Analytics to track activity on our websites, in our emails and in our mobile application and to engage in analysis, auditing, research, and reporting. We have enabled user ID tracking in Google Analytics which allows Google to track your activity on our websites, in our emails and in our mobile application, however, your identity is still anonymous to Google. We may use other third-party analytics service providers, and they may set and access cookies on your device and may use similar technologies to collect information about your interaction with our websites, our emails and our mobile application. Tracked activities include sites or screens visited, session duration and information about the way you use our services. The information generated about your use of our websites and mobile application, and your interaction with our emails may be transmitted to and stored by Google Analytics or such other third-party service provider. However, we do not share personally identifiable information with Google Analytics or any other third-party analytics service provider. By using our websites or mobile application or interacting with our emails, you consent to the processing of data about you by Google and any other third-party analytics service provider, as applicable, in the manner and for the purposes set forth above. Further information concerning the terms and conditions of use and data privacy for Google Analytics can be found at <https://policies.google.com/technologies/partner-sites>.

#### **What choices are available to you regarding email communications?**

CIS will send a regular newsletter to clients and those that have signed up for it. We may also send other “Special Reports” or items of interest. We may use your email address to send you information on products or services that we believe may be of interest to you. If you do not wish to receive these communications from us, you may update your communications preferences. You can also contact CIS at [info@cornerstoneri.com](mailto:info@cornerstoneri.com) and we will remove you from our email list. However, even if you choose not to receive emails from us, we may be required to send emails to you to comply with our legal and regulatory obligations.

#### **How can you change your personal information?**

You can change your personal information by logging into your account. If you have any questions, please Contact the Providence office at 401-453-5550.

#### **Changes to this policy**

We reserve the right to make changes to this policy from time to time without prior notice. Any changes to this policy will be posted here so it is best to refer back to this policy regularly. Your use of our websites, mobile application or emails after any changes have been posted will constitute your agreement to the modified policy, and the modified policy will automatically apply to any information that we collect from the effective date of such modified policy.

#### **Changes to the use of your personal 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 email, and you will have the option as to whether or not we use your information in this way. We will rely on the contact information that you, your plan sponsor or your plan administrator provides to communicate with you.

#### **Protecting children's privacy online**

Our products and services are not marketed to minors and we do not knowingly collect information from anyone under the age of 13.

#### **Viruses**

Because of the massive increase in Internet viruses, malware and other nefarious programs infecting and affecting the internet, we want to warn you about infectious or viral contamination on your system. It is your responsibility to scan any and all downloaded materials received from the Internet. We are not responsible or liable for any damage caused by such hazards.

**Contact information:**

Email: [info@cornerstoneri.com](mailto:info@cornerstoneri.com)

Mail: 245 Waterman St, Ste 301, Providence, RI, 02906

Phone: (401) 453-5550

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