

Privacy Policy

Version: 1.2 | 11-15-22

Welcome! Thanks for visiting **wealthpilot**, an application that provides innovative insights into your financial assets and facilitates your path to financial freedom. Use of the words “wealthpilot,” “we,” “us,” or “our” refer to any or all wealthpilot entities and their affiliates. This “Privacy Policy: explains what Personal Information (as defined below) we collect, why we collect it, how we use and disclose it.

Your privacy matters to us so whether you are new to wealthpilot or a long-time customer, please do take the time to get to know and familiarize yourself with our policies and practices. Feel free to print and keep a copy of this Privacy Policy, but please understand that we reserve the right to change any of our policies and practices at any time. If this Privacy Policy changes, you will have to accept it again before being able to use the application and our products. But don't worry, you can always find the latest version of this Privacy Policy here on this page.

- 1. What Kind of Personal Information Do We Collect..... 2
- 2. How We Use Your Personal Information 3
- 3. How We Share Your Personal Information 4
- 4. Cookies 5
- 5. Direct Marketing..... 5
- 6. Information Security..... 5
- 7. Consumers Rights 5
- 8. Contact Us 6

1. What Kind of Personal Information Do We Collect

As used herein, “Personal Information” means information that identifies or is reasonably capable of identifying an individual, directly or indirectly, and information that is being associated with an identified or reasonably identifiable individual.

A. Personal Information we collect from you

We or third parties as specified herein may access or collect the following categories of Personal Information directly from you:

- **Identification Information**, such as name, email, phone number you provide to us;
- **Financial Information**, such as manually added data: *cash and equivalents, investments, illiquid investments, liabilities* and automatically fetched data: *account balances, security holdings, cash holdings*

you provide us via the third party service providers (MX Technologies) to we use to make your information accessible to advisors;

- **Correspondence**, such as information that you provide to us in correspondence, and ongoing customer support.

wealthpilot does not have access to your Financial Information.

B. Personal Information we collect automatically

We may collect the following categories of Personal Information automatically through your use of our services:

- **Usage Data**, such as system activity, internal and external information related to wealthpilot pages that you visit, clickstream information; and

Our automatic collection of Personal Information may involve the use of Cookies, described in greater detail below.

C. Personal Information we collect from third parties

We may collect and/or verify the following categories of Personal Information about you from Third Parties:

- **Financial Information**, such as bank account information, loan and financial investment

We use the following third parties to gather certain information, as specified below:

- **MX Technologies Inc. 3401 North Thanksgiving Way Ste 500 Lehi, UT 84043. (“MX”)** to gather your data from financial institutions. By using the Service, you grant wealthpilot and MX the right, power, and authority to act on your behalf to access and transmit your personal and financial information from your relevant financial institution. You agree to your personal and financial information being transferred,

stored, and processed by MX in accordance with the MX end user privacy policy.
<https://www.mx.com/privacy-policy/termsfuse@mx.com>

- **Firebase (google llc, 1600 AMPHITHEATRE PARKWAY MOUNTAIN VIEW CA 94043) with the following products:**

- 1. Analytics**

- Google Analytics
Personal data: Usage data; trackers

- 2. Social functions**

- Firebase Dynamic Links
Personal data: various types of data, as described in the service's privacy policy

- 3. Managing contacts and sending messages**

- Firebase Cloud Messaging
Personal data: various types of data, as described in the service's privacy policy

- 4. Beta Testing**

- Google Play Beta Testing
Personal Data: Data submitted during the use of the service

- 5. Infrastructure Monitoring**

- Firebase Performance Monitoring
Personal data: various types of data, as described in the service's privacy policy
- Crashlytics and Crashlytics with user opt-in.
Personal Data: Crash data; device information; Universally Unique Identifier (UUID).

<https://firebase.google.com/support/privacy>

D. Accuracy and retention of Personal Information

We will only retain your personal data for as long as necessary for the purpose for which data was collected and to the extent required by applicable law. When we no longer need personal data, we will remove it from our systems and / or take steps to anonymize it or make it inaccessible.

We do not have access to or store the financial information you enter, whether through a third party or manually. This financial information is only stored locally on your device, and you may choose to share it with third parties.

2. How We Use Your Personal Information

The Personal Information we collect, and the practices described above are done in an effort to provide you with the best experience possible, protect you from risks related to improper use and fraud, and help us maintain and improve wealthpilot. We may use your Personal Information to:

A. Provide you with our services. We use your Personal Information to provide you with our Services pursuant to the terms of our User Agreement. That means we may contact you by email at an email address you provided or within the app. We use the Personal Information you provide to us to, for example:

1. aggregate your current wealth situation, ;
2. calculate your financial freedom date as well as the actions to reach financial freedom earlier;
3. at your request, facilitate an appointment with financial advisors;
4. inform or update you about our services, your choices, or provide any notifications as part of our services.

B. Comply with legal and regulatory requirements. We use your Personal Information as required by applicable laws and regulations.

C. Protect the security and integrity of our services. We use your Personal Information to further our security-first mentality. Maintaining the security of your account and fulfilling your requests, for example, to facilitate an appointment with a financial advisor, requires us to process your Personal Information, including information about your device and other relevant information.

D. Provide you with customer support. We process your Personal Information anytime that you reach out to our customer support team with issues arising from your account.

E. Optimize and enhance our services. We use your Personal Information to understand how our products and Services are being used to help us improve our Services and develop new products.

G. Market our products to you. We may contact you with information about our other Products & Services and Notifications regarding this app. We will only do so with your permission, which can be revoked at any time, by contacting us via email security@wealthpilot.com. As long as you are using our Services, we will have to contact you to provide information relevant to our Services.

H. Other business purposes. We may use your information for additional purposes if that purpose is disclosed to you before we collect the information or if we obtain your consent.

3. How We Share Your Personal Information

We will not share your Personal Information with third parties, except as described below:

A. Service Providers. We may share your Personal Information with third-party service providers for business or commercial purposes. Your Personal Information **may** be shared so that they can provide us with services, including identity verification, fraud detection and prevention, security threat detection, payment processing, customer support, data analytics, Information Technology, advertising, marketing, data processing, network infrastructure, storage, transaction monitoring, and tax reporting. We share your Personal Information with these service providers only so that they can provide us with services, and we prohibit our service providers from using or disclosing your Personal Information for any other purposes except if you want to share with advisor. Our third-party service providers are subject to strict confidentiality obligations.

B. Consent to Professional Advisor or Registered Investment Advisor firm: We may share or disclose your information with your consent only to professional certified advisor and registered investment advisory firms.

If we decide to modify the purpose for which your Personal Information is collected and used, we will amend this Privacy Policy.

4. Cookies

When you access Wealthpilot, we may make use of the standard practice of placing tiny data files called cookies, flash cookies, pixel tags, or other tracking tools (herein, "Cookies") on your computer or other devices used to visit Wealthpilot. We use Cookies to help us recognize you as a customer, collect information about your use of Wealthpilot to better customize our services and content for you, and collect information about your computer or other access devices.

You also can learn more about cookies by visiting <https://www.allaboutcookies.org>, which includes additional useful information on cookies and how to block cookies on different types of browsers and mobile devices. Please note that if you reject cookies, you will not be able to use some or all of Wealthpilot. If you do not consent to the placing of Cookies on your device, please do not visit, access, or use Wealthpilot.

5. Direct Marketing

Subject to applicable laws and regulations, we may from time to time send direct marketing materials promoting services, products, facilities, or activities to you using information collected from or about you. You may opt-out of such communications at any time by visiting the Exchange tab of your Account Settings page. You may also opt-out of such communications by following the directions provided in any marketing communication. It is our policy to not provide your Personal Information for those third parties' direct marketing purposes without your consent.

6. Information Security

No security is foolproof, and the Internet is an insecure medium. We cannot guarantee absolute security, but we work hard to protect Wealthpilot and you from unauthorized access to or unauthorized alteration, disclosure, or destruction of Personal Information we collect and store. Measures we take include encryption of the Wealthpilot website communications with SSL; required two-factor authentication for all sessions; periodic review of our Personal Information collection, storage, and processing practices; and restricted access to your Personal Information on a need-to-know basis for our employees, contractors and agents who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

7. Consumers Rights

Consumers have the following rights with respect to their Personal Information. Please understand, however, that these rights are not absolute, and we may decline requests as permitted under applicable law.

- **Right to Request Access.** You may submit a request that Wealthpilot disclose the categories and specific pieces of personal information that we have collected, used, or disclosed about you in the past 12 months.
- **Right to Request Deletion.** You may submit a request that Wealthpilot delete the personal information that we have about you.
- **Right to Opt out of Sale of Personal Information.** You have the right to opt out of the sale of your Personal Information and delete your account information. Wealthpilot does not sell your Personal Information.
- **Right to delete account.** You have the right to delete your account with the respective account information.

You may submit a request to access or delete your personal information by following the “Exercise your privacy rights” link on your Account Profile page or by emailing us at privacy@wealthpilot.com

We recommend that you submit your request through the Account Settings page because it is a more secure method than email. We are legally obligated to verify your identity when you submit a request. We may request additional information from you to verify your identity. If you submit a request to delete your personal information, you will also be required to confirm the deletion request by email.

8. Contact Us

If you have questions or concerns regarding this policy or our processing of your Personal Information, please feel free to email us at: privacy@wealthpilot.com; or write to us at:

[wealthpilot Inc., 99 Hudson Street, 5th Floor #7237, New York, NY 10013](#)