

LIFESTYLEPLAN™ PRIVACY POLICY

Last modified: July 10, 2019

NSYFinancial, LLC (“**LifeStylePlan**”) operates the LifeStylePlan mobile application (“**App**”), LifeStylePlan.com and NSYFLLC.com websites (“**Site(s)**”), and the financial services offered through our platform (together with the App and the Sites, the “**Services**”). LifeStylePlan.com is a technology-enabled service that collects, stores, aggregates, organizes, and presents financial client permission data in real-time providing clients with the information necessary to make financial decisions.

LifeStylePlan respects and protects the privacy of the users that use our Services. We maintain strict policies to ensure the privacy of those who use our Services (“**End Users**”) or those who may just be visiting our Site (“**Visitors**”). This policy (“**Privacy Policy**”) describes the types of information we may collect from you and our practices for how we collect, use, maintain, protect, and disclose such information. The way that we collect and use your information depends on the way you access the Services (whether by Site or by App). This Privacy Policy also includes a description of certain rights that you may have over information that we may collect from you.

By using the Services, you agree to this Privacy Policy. If you do not agree with our policies and practices, your choice is to not use our Services.

Information that LifeStylePlan Collects		
Types of Information Collected	Personal Data:	<p>“Personal Data” is information by which you may be personally identified. LifeStylePlan may collect the following Personal Data from you:</p> <ul style="list-style-type: none"> • Name; • Email; • Phone number; • Mailing address; • Screen Name/Username; • Profile Photo; • Password; • Bill Payment Information; • Income/Salary; • Social Security Number; • Drivers License Number or other ID number; • Financial information; and • Billing information.
	Non-Personal Data	<p>Non-personal data includes any data that cannot be used on its own to identify, trace, or identify a person.</p> <p>We may combine non-Personal Data you give to us with Personal Data we collect about you. When combined, this will be treated as Personal Data and we will only use it in accordance with this Privacy Policy.</p>
How we collect information.	<p>With the exception of IP addresses which may be automatically collected through your use of the Site, we collect your Personal Data when you or your financial advisor affirmatively give it to us through interactions with the Services, including:</p> <ul style="list-style-type: none"> • During sign up to create an account on the Site; • When you download and create an account through the App; • Feedback forms; • Through service requests or customer support; and • Through survey and/or contact us forms; <p>We may collect non-Personal Data via automatic means including through cookies or through our third-party service providers listed below.</p>	
Why we collect and how we use your	<p>In general, we collect and use your Personal Data for the following reasons:</p>	

<p>information. (Legal Basis)</p>	<ul style="list-style-type: none"> • when it is necessary for the general functioning of the Services, including to facilitate payments; • when it is necessary in connection with any contract you have entered into with us (including our terms of service) or to take steps prior to entering into a contract with us; • when we have obtained your prior consent to the use (this legal basis is only used in relation to uses that are entirely voluntary – it is not used for information processing that is necessary or obligatory in any way); • when we have a legitimate interest in processing your information for the purpose of providing or improving our Services; • when we have a legitimate interest in using the information for the purpose of contacting you, subject to compliance with applicable law; or • when we have a legitimate interest in using the information for the purpose of detecting, and protecting against, breaches of our policies and applicable laws. <p>We may use aggregated (anonymized) information about our End Users, and information that does not identify any individual, without restriction.</p>	
<p>Accessing and Controlling Your Information</p>	<p>LifeStylePlan acknowledges the individual’s right to access and control their Personal Data. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data may do so through their account settings or by contacting us. If requested to remove data, we will respond within a reasonable timeframe.</p> <p>If you would like to prevent us from collecting your information, you should cease use of our Services. You may have the option to opt-out of certain communications or data collection methods as specified when presented to you, such as opt-ins or unsubscribe options. Please be aware that you are unable to opt-out of certain communications, including transaction-based communications.</p>	
<p>How Long do we Store Personal Data?</p>	<p>We will only retain your Personal Data for as long as is necessary to fulfil the purposes for which it is collected. This length of time may vary according to the nature of your relationship with us. Personal Data will be purged after five years of nonuse of an account.</p>	
<p>Automated Data Collection Methods</p>	<p>Cookies</p>	<p>A cookie is a small file placed on the hard drive of your computer. We use cookies to help us manage and report on your interaction with the Site(s). Through cookies, we are able to collect information that we use to improve the Services, keep count of return visits to our website, collect and report on aggregate statistical information, authenticate your login credentials, or manage multiple instances of the Site in a single browser. We may also collect other data such as the date and time you visited the Site, and your current IP address. Refusing cookies through your browser may cause you to be unable to access certain parts of our Services or the functions of the Site may be impaired.</p>
	<p>Log Files and Web Beacons</p>	<p>Pages of the Site(s) may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email, to collect data on browser types, to collect IP addresses and physical location; to report access times, and for other related statistics. Occasionally, we connect Personal Data to information gathered in our log files as necessary to improve our Services.</p>
<p>Users under the age of 16</p>	<p>Our Services are not intended for children under 16 years of age and we do not knowingly collect Personal Data from children under 16. If you are under 16, do not use or register on the Services, make any purchases, use any of the interactive or public comment features, or provide any information about yourself to us. If we learn we have collected or received Personal Data from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at the email address listed below.</p>	
<p>Do Not Track Settings</p>	<p>We do not track our Users over time and across third party websites to provide targeted advertising and do not specifically respond to Do Not Track (“DNT”) signals.</p>	

Who We Share Data With

We may use aggregated (anonymized) information about our End Users and Visitors, and information that does not identify any individual, without restriction.

Financial Advisors	If you permit us to do so, or if you are signed up for the Services by your financial advisor, we may share limited data with your financial provider. You may revoke this sharing at any time.
Affiliates	We may, for our legitimate interests, share your information with entities under common ownership or control with us who will process your information in a manner consistent with this Privacy Policy and subject to appropriate safeguards.
Successors in Interest.	We may, for our legitimate interests, share your information with a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, in which Personal Data about our End Users is among the assets transferred. You will be notified of any such change by a prominent notice displayed on our Services or by e-mail. Any successor in interest to this Privacy Policy will be bound to the Privacy Policy at the time of transfer.
Law enforcement and other governmental agencies.	We may share your information when we believe in good faith that such sharing is reasonably necessary to investigate, prevent, or take action regarding possible illegal activities or to comply with legal process. This may involve the sharing of your information with law enforcement, government agencies, courts, and/or other organizations.
Service providers and partners.	We may, for our legitimate interests, share your information with contractors, service providers, third party authenticators, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them. These service providers may be located in the EEA, US or in other locations. A list of some of our service providers and partners is provided below.

Service Provider/Partner	Why we Share	Privacy Practices
Amazon Web Services	All information you provide to us is stored on our secure servers provided by Amazon Web Services.	http://aws.amazon.com/privacy/
Yodlee	We use Yodlee’s Fast Link API integration to obtain financial account balances and transactions in order to assist in the creation of the client lifestyle plan as well as the net worth calculation.	https://www.yodlee.com/legal/privacy-notice/
Freshdesk	We use Freshdesk for customer support ticket management. To do so, we share users’ username, first name, and last name. The support tickets can be created directly from the website by using the Fresh desk support widget.	https://www.freshworks.com/privacy/? ga=2.139236915.1476506102.1556135392-1638731140.1556135392

Third-Party Services and Websites

LifeStylePlan is not responsible for the privacy policies or other practices employed by websites linked to, or from, our Site or App nor the information or content contained therein, and we encourage you to read the privacy statements of any linked third party.

Data Storage and How LifeStylePlan Protects Your Information

LifeStylePlan stores Personal Data about End Users and Visitors within the United States. If you are using the Services from the EEA or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your Personal Data to the United States. The United States may have laws which are different, and potentially not as protective, as the laws of your own country. By providing your Personal Data, you consent to any transfer and processing in accordance with this Privacy Policy.

LifeStylePlan employs industry standard physical, electronic and managerial control procedures to safeguard and help prevent unauthorized access to your information. We choose these safeguards based on the sensitivity of the information that we collect, process and store and the current state of technology. Our outsourced service providers who support our operations are also vetted to ensure that they too have the appropriate organizational and technical measures in place to protect your information

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your information transmitted to the Services. Any transmission of information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services. In the event that there is breach in the information that we hold, we shall notify of such breach via email or via notice on the Services.

California and Vermont Specific Rights

California: If your LifeStylePlan account has a California mailing or billing address affiliated with it we will not share Personal Data we collect about you except to the extent permitted under California law. California residents are permitted to request a full list of Personal Data stored by LifeStylePlan, which may be subject to a reasonable fee. To make such a request, please send an email to the email address listed below.

If you are a California resident under the age of 18, and a registered user of our Services, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an e-mail with a detailed description of the specific content or information to the email address listed below.

Vermont: If your LifeStylePlan account has a Vermont mailing or billing address, we will not share Personal Data we collect about you with non-affiliates unless the law allows or you provide authorization.

Changes to the Privacy Policy

It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat our End Users' or Visitors' Personal Data, we will notify you by email to the primary email address specified in your account or through a prominent notice on the Site or App. Such changes will be effective when posted. The date the Privacy Policy was last revised is identified at the top of the page. Your continued use of our Services following the posting of any modification to this Privacy Policy shall constitute your acceptance of the amendments to this Privacy Policy. You can choose to discontinue use of the Service if you do not accept any modified version of this Privacy Policy.

Questions and Comments

If you have any questions about this Privacy Policy, please contact us by email at Privacy@LifeStylePlan.com.