



**Vident Asset Management
Internet Privacy Policy
March 2023**

Your privacy is important to us. Vident Asset Management (“Vident”, “us”, “we” or “our”) is committed to protecting and safeguarding your personal information. This Internet Privacy Policy in conjunction with our privacy policies and procedures, privacy notice, and information technology and cybersecurity policies and procedures collectively aim to protect and safeguard your information and inform you of the information we collect and how we may use it.

A. Protected Information

A financial institution, such as Vident, must respect the privacy of its customers and protect the security of “non-public personal information,” defined as personally identifiable financial information provided by a customer, obtained as a result of a transaction with a customer or obtained otherwise. Personally identifiable information is treated as “financial” if the financial institution received the information in connection with providing a financial product or service to a consumer. Thus, any information provided by U.S. persons with managed accounts in connection with the investment advisory relationship should be considered subject to these privacy requirements. In addition, information created in the course of the relationship, such as account balances and securities positions or transactions, is subject to privacy protection.

We collect personal information about you in a variety of ways. To the extent any information you provide, or we obtain from our website constitutes personal information, we have established procedures for the use and retention of that information. We will not use your personal information for any purposes inconsistent with our privacy policies and procedures without your permission. We may collect personal information, for example from your IP address, operating system, and web browser that you use to access our website or by some other means such as via an email on our contact us page. We may ask you to provide us with certain information about yourself. This information may include your name, company name, title, address, email address, telephone number, and corporate contact details. The information obtained from our website is not account related and is generally for contact information purposes to discuss our products and services.

In addition, we use cookies to improve and personalize your experience (see below for a further discussion).

We maintain safeguards that comply with federal standards to protect non-public personal information, restrict access to the personal and account information of customers to those employees who need to know that information in the course of their job responsibilities, and require that third parties with which Vident shares such information must agree to follow appropriate standards of security and confidentiality.

Vident does not provide information about individuals to affiliates for any marketing purposes.

Outside service providers, including our attorneys, auditors, broker-dealers, and administrators, may be given access to non-public personal financial information concerning customers in connection with the provision of services to Vident and our customers. It is Vident's reasonable belief that such service providers are capable of maintaining and have in place appropriate safeguards to protect customer information.

B. Links to Other Websites

Our website may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's website. We strongly advise you to review the privacy policy of every website you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party websites or services.

C. Cookies

We may use information gathering tools such as cookies and web beacons to collect information as you navigate our site. A cookie is a small file of letters and numbers that is stored on your computer, tablet, mobile phone, or other device when you visit a website or a mobile application. Cookies contain information that is transferred to, or read on, your device and allow websites and mobile applications to recognize devices and store certain information, such as user preferences. Cookies are used to distinguish you from other users of our online services. This helps us to provide you with a useful experience when you browse, and also allows us to improve our online services.

If you are concerned about having cookies on your computer or other device, you can set your web browser to refuse all cookies or to indicate when a cookie is being set, allowing you to decide whether to accept it. You can also delete cookies from your device. The help feature on most web browsers will tell you how to prevent your browser from accepting new cookies, how to receive notice when a new cookie is set, and how to disable cookies altogether. However, if you choose to block or delete cookies, certain features of our website or our mobile application may not operate correctly.

D. Changes to This Internet Privacy Policy

We may update our Internet Privacy Policy from time to time. We will notify you of any changes by posting the new Internet Privacy Policy on this page. You are advised to review this Internet Privacy Policy periodically for any changes. Changes to this Internet Privacy Policy are effective when they are posted on this page.

E. How to Contact Us

If you have any questions, comments, or concerns about this Internet Privacy Policy or the information practices of this website including our collection of any personal information, please contact us as follows:

Vident Asset Management
1125 Sanctuary Pkwy, Suite 515
Alpharetta, GA 30009
(404) 487-1961
disclosure@videntam.com