

PRIVACY POLICY

Effective Date: May 1, 2021

Uncommon Investment Advisors LLC and the Uncommon Investment Funds Trust and its constituent series (“we”, “us”, or “our”) are committed to maintaining the confidentiality, integrity, and security of personal information about our current and prospective customers (“you”, “your”, or “yours”). This Privacy Policy (“**Policy**”) provides information you about our collection, use, disclosure, and storage of data about your personal information that we collect from various sources that are described below.

Personal information means information about an individual that is collected or maintained for business purposes and by which the individual can be identified.

Other information is information by which an individual cannot be identified (for example, anonymous or aggregated information). Other Information is not considered personal information and therefore is not subject to this Policy.

Please review this Policy carefully. If you have any questions or concern, please contact us at investments@uncommon.today.

We will update this Policy as is necessary to respond to changing requirements and advances in technology. We will keep the current version of this Policy posted on our website. By using our services after a new version of this Policy has been posted, you agree to the terms and conditions of such version of this Policy.

PERSONAL INFORMATION WE COLLECT

The nature of the information that we collect will depend on the services we provide and our relationship with you. We categorize personal information we collect as follows (the categorization and examples are not exhaustive):

Personal Identification Data:

Full name, title, gender, marital status, date of birth, passport number, driver’s license number, social security number or other national identification number, and signature.

Contact Data:

Personal address, telephone number, email address(es).

Communication Monitoring Data:

To the extent required or permitted by law, we may record and monitor your electronic and telephone communications with us, as well as written communications.

Financial Data:

Bank and other financial account numbers and payment services you use, household income.

Marketing and Communications Data:

Marketing and communication preferences; tracking data relating to whether you have read or responded to marketing communications.

Professional Information Data:

Profession, employer, position/job title, work address; telephone number; and email address.

Profile Data:

Username and password for our online services that you have set up; investments and our services you use.

Services Data:

Payment details to and from you; details of services you use, or we have provided to you.

Technical Data:

Your use of, and interaction with, our online services; your IP address; browser type and version; browser plug in types and versions; your computer and phone hardware and operating systems

Other Data:

In certain limited circumstances, where allowed, or when required, by law, we may collect information about criminal convictions and offences, marital status, and sexual orientation if you provide details of your spouse or partner; political affiliations for us to determine whether you are a “politically exposed person.”

HOW WE COLLECT PERSONAL INFORMATION

We may collect public and non-public personal information about you from any of the following sources:

- When you visit or log into our website or use our mobile applications (our mobile apps allow you to access your accounts, trade securities, move money, and access news and other information);
- Other interactions with us or our service providers (for example, discussions with customer service staff, information you enter into our websites, or when you enroll in certain of our services);
- When you interact with us on social media platforms or from public sources where you have deliberately chosen to make your personal information public, including through public profiles on social media and may include information such as social media account ID and any content you post, such as pictures, information, opinions, or any personal information that you make available to other participants;
- During the course of your relationship with us which include transactional activity in your account (for example, trading history and balances);
- When you respond to our advertising whether directly from us, on our website or mobile apps, or those of third party companies we have engaged;
- When you or your representative provide the information to us in connection with a product or service we offer (such as an application form even if you do not submit it to us) that can include name, address, Social Security number, birth date, assets, and income; and your preferences (for example, your choice of electronic statement delivery, or the screen layout you specify if you use our Internet sites);
- From the submission of solicited and unsolicited resumes;
- If you are a representative of an organization or entity that is a client or provides services to us and the organization or entity provides us with your personal information;
- Information from consumer reporting agencies, third party analytics services (see below for more information) and other third-party data services;
- We may also create or derive personal information as creating records of your interactions with us, subject to applicable law; and
- Other sources with your consent or with the consent of your representative.

We use “cookies” and similar technologies to obtain certain types of data when your web browser accesses our website. Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser to enable our system to recognize you and your personalized settings, to better understand how you interact with us, to monitor aggregate usage, and to optimize web traffic routing on our website. Most browsers have settings to disable or limit cookies, but please note that certain areas or features of our website and services may not be available or fully-functional if you choose to disable cookies for our websites. We may also use pixel tags, web beacons, or similar technologies to understand how our users interact with our sites and emails. Our website does not respond to “do not track” signals.

Third Party Analytics. We also use third-party analytics services such as Google Analytics and ActiveCampaign, which help us understand how users are finding and using our website and services. To learn more about Google Analytics’ privacy practices, you can visit <https://support.google.com/analytics/answer/6004245?hl=en>. To opt out of Google Analytics’ metrics, you can follow the instructions at <https://tools.google.com/dlpage/gaoptout>. You can opt out of ActiveCampaign emails by following the instructions in such emails.

HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information:

- To respond to your inquiries and communications to us;
- To improve, maintain, and operate the website;
- To provide you with services;
- To inform you about opportunities, events, or services in which you may be interested, including those offered by our affiliates;
- To investigate and prevent possible fraud;
- To exercise or defend our rights and comply with statutory and regulatory requirements, including responding to lawful requests for information by governmental authorities and others (e.g., subpoenas); and

- For other reasons with your prior consent.

DISCLOSURE OF YOUR PERSONAL INFORMATION

We will not sell your personal information for unaffiliated third-party marketing or solicitation. We may share your information with our affiliates and as needed to fulfill the purposes described in the “How We Use Your Personal Information” section, including:

- Our service providers, brokers, custodians, and other providers such as customer support providers, anti-fraud specialists, and payment processors, who are only permitted to use the data on our behalf;
- Credit reference agencies or other organizations that help us to conduct anti-money laundering and anti-terrorist financing checks and to detect fraud and other potential criminal activity; As necessary to exercise or defend our rights or comply with applicable law or orders from law enforcement and other governmental authorities;
- Other third-parties, with your consent or as directed by your representative (for example, as a financial reference in applying for credit with another institution or if you use an external aggregation website or service that you have provided permission to access your account); and
- Other organizations as permitted or required by law (for example for fraud prevention or to respond to a subpoena).

Additionally, in the event of an actual or potential merger, consolidation, sale, or transfer of all or substantially all of our assets or business, one of the assets that would generally be transferred is the data we have collected, which would be transferred subject to the applicable version of this Policy.

We may disclose Other Information (which does not identify you personally) to any parties and for any purposes we deem appropriate.

OPTING OUT FROM PROMOTIONAL OR MARKETING EMAILS

You can opt out of receiving promotional or marketing emails from us at any time by clicking the unsubscribe, opt-out, or similar link at the bottom of any such emails. Please note we may still contact you in connection with your account or any transactions involving you.

DATA RETENTION, ACCESS, AND CORRECTION; SECURITY

We are based in the United States, and the platform on which our website and online services operate are hosted in the United States. By using our website and online services you consent to your personal information being transferred to and stored in the United States.

We may retain your data so long as we can reasonably foresee the data may be required in connection with our business relationship with you. In some cases, we will retain the data for a longer period as necessary to comply with our legal, regulatory, accounting, reporting, internal records retention policy and other policy requirements or for the establishment or defense of legal claims obligations, resolve disputes, and enforce our agreements.

You may access and update your personal information by visiting your account profile. You may also request erasure of your personal information in certain circumstances. To request access to, correction of, or erasure of your personal information, please contact us as set forth at the end of this Policy.

We understand the importance of preserving the security of your personal information. Accordingly, we use industry-standard administrative, physical, and technological measures designed to protect your personal information from unauthorized access or use. However, no internet transmission can be guaranteed to be 100% secure from interception or other unauthorized access or use. Please do not provide any sensitive personal information (like credit card number or social security number) through unprotected methods like email correspondence.

YOUR CALIFORNIA PRIVACY RIGHTS

California law entitles California residents to certain additional protections regarding Personal Data. “**Personal Data**” for purposes of this section means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. California residents have the right to request:

- information regarding your Personal Data we have collected in the past 12 months (including the categories of Personal Data we have collected, the categories of sources of such information, and the purposes for which we have collected such information);
- notice of whether we have disclosed your Personal Data to third parties in the past 12 months (and if so, what categories of information we have disclosed, and what categories of third parties we have disclosed it to);
- a copy of your Personal Data collected by us in the past 12 months; and
- that your Personal Data be deleted.

We will not discriminate against you if you choose to exercise any of these rights. To make any of the above requests, please contact us as set forth at the end of this policy. We may require verification of your identity before further processing your request. In certain instances, we may be permitted by law to decline some or all of such request.

CHILDREN

Our website is not directed toward children under 13. We do not intentionally collect information on our website from those we know are under 13. If a parent or guardian becomes aware that his or her child has provided us with personal information without their consent, please contact us as set forth at the end of this Policy and we will take reasonable steps to remove such data from our systems.

THIRD PARTY SITES

Our website and mobile apps may include hyperlinks to third party sites and services. If you visit or use such third party sites and services, please be mindful that the relevant third party controls the cookies and other technologies it uses on its sites and how it collects, uses, and shares personal information from you. This Policy only governs our own privacy practices; please review the applicable third party privacy policy when visiting or using any third party sites or services.

CONTACT

For more information or for help in answering any questions or concerns you may have, please contact us at investments@uncommon.today.