

Symmetry Privacy Policy

Last Updated: January 11, 2024

Effective Date: January 17, 2023

This policy describes how Symmetry Financial Group, LLC, and its direct and indirect subsidiaries, sister companies, affiliates and parent companies ("Symmetry," "the Company," "we", "us", or "our") collect, use, and disclose Personal Information in connection with Symmetry websites ("Sites") and mobile applications ("Apps") (collectively, the "Services") that link to this Privacy Policy. Certain services and websites may have different privacy policies that apply to that particular service or website. In such instances, you should review those policies when using such service or website. This Privacy Policy also tells you about your rights and choices with respect to your Personal Information, and how you can reach us to get answers to your questions.

TYPES OF PERSONAL INFORMATION WE COLLECT

At Symmetry, we recognize and respect your privacy. "Personal Information" generally refers to any information that can be linked to an identified or identifiable person. The Personal Information that we collect about you varies depending on the context of our interactions with you. The following describes the types of Personal Information that we collect from you for our purposes and how we use that information. The term Personal Information also covers certain categories of "Sensitive" or "special" Personal Information that often receive additional protections and/or are subject to additional restrictions under applicable laws. In this Privacy Policy, we refer to this information as "Sensitive."

Information We Collect From You

When you use the Services, several types of information may be collected from you, including: (1) Device Information; and (2) Personal Information.

Device Information

We may automatically collect Device Information regarding use of or access to the Services, such as:

- The type of device you use to access the Services;
- The date and time you access the Services;
- The type of web browser you use to access the Services;
- The sections within the Services that you access;
- The Internet Protocol ("IP") address (a number that is automatically assigned to a computer when the Internet is used);
- The user language;
- The operating system;
- The presence/absence of "flash" plug-ins;
- The screen resolution; and
- The connection type that you use to access the Services.

In addition, we may collect location information through the use of technology when you use our Services, such as data associated with your IP address or other online or device identifier. If you do not want us to collect and use this information, you may be able to disable the location features on your device. Check your device manufacturer settings for information on how to do so.

This information (collectively, "Device Information") does not, by itself, personally identify users. We use this Device Information to monitor the effectiveness of the Services, to help personalize your experience, and to consider potential improvements to the Services. Device Information may be collected through cookies or similar technologies. For more detailed information on cookies, please refer to the "Cookies and other Information Collecting Technologies" section below.

Personal Information

Access to and/or use of some Services may require disclosure of certain Personal Information as further described below.

The categories and specific types of Personal Information that Symmetry may collect about you include:

- **Direct identifiers and contact information**, including your name, address, phone number, email address, business contact information, or other similar identifiers.
- **Demographic information**, including race, ethnicity, gender, age, location, and user data obtained through surveys or questionnaires.
- **Identifiers of our customers, third-party partners and collaborators, and their employees**, with whom we may interact.
- **Account registration information**, such as your email address and password and user profile data provided when you create or update your account.
- **Health-related information**, such as information about a health condition or medical history as part of your use of the Services.
- **Drug and alcohol use**, as part of your use of the Services.
- **Government identifiers**, such as Social Security number, driver's license and other government identification documents (which may contain document numbers, birth date, gender and photo).
- **Payment or banking information**, including credit card number, name on credit card, expiration date, security code, and billing address.
- **Geolocation Data**.
- **Information you submit when you contact us for support**.
- **Sensitive (Special) Personal Information** (where permitted and in accordance with applicable law), of the information listed above, social security number, passwords, racial or ethnic origin, and/or health information also qualify as Sensitive (special) Personal Information.

The provision of the Personal Information, including Sensitive (special) Personal Information, listed above is voluntary. In certain instances, however, we will not be able to process your request for our Services without the requested Personal Information.

The following information may also be Personal Information depending on how it is used and linked with other information.

- If you receive an email from us, we may use certain tools to capture data related to when you open our message or click on any links or banners it contains.
- Website or mobile App interactions, including how you interact with links you can click on, information that you type into online forms or information about your device or browser.
- Information about how you interact with our Services. This includes data such as access dates and times, app features or pages viewed, app crashes and other system activity, type of browser and third party sites or services used before interacting with our Services.
- Browser type, operating system, IP address, domain name, click-activity, referring website, and/or a date/time stamp for visitors.

SOURCES OF PERSONAL INFORMATION

We collect your Personal Information in the following ways, pursuant to applicable law:

- **Directly From You**, when you use or purchase our Services, register for an account or create a profile, contact us, respond to a survey, sign up to receive emails, text messages, and/or postal mailings.
 - **Through Our Use of Cookies and Other Automatic Data Collection Technologies**, when you visit our websites, use our mobile applications, open or click on emails we send you, or interact with our advertisements. We or third parties we work with automatically collect certain information using technologies such as cookies, web beacons, clear GIF, pixels, internet
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tags, web server logs, and other data collection tools. For more information, please see "Cookies and Online Interactions" section below.

- **From Our Third Party Partners**, including from third parties that we have partnered with to provide you the Services that you have requested from us.
- **Network and Wireless Providers** you may contract with, which you hereby authorize to use or disclose information about your account and your wireless device, if available, to us for the duration of your business relationship, solely to help them identify you or your wireless device and to prevent fraud.
- **Other Sources**, including data analytics providers or publicly available sources.

USE OF YOUR PERSONAL INFORMATION

We use your Personal Information and Sensitive Personal Information above for the following business purposes ("Processing Purposes") associated with our general business operations.

- We may use your Personal Information for everyday business purposes, such as account management, contract administration, website management, corporate governance, and legal and regulatory reporting obligations.
- We may use your Personal Information to provide you with the Services that you requested. This means that we may use your Personal Information to respond to your questions, process and fulfill your product orders, operate the Services, notify you when we think you may be interested in or eligible for certain Services (as permitted by applicable law), perform our obligations to you, perform the purchase contract for the products, items or services you have purchased or any other contract with us through the Services, and perform other actions based on your consent.
- We may use your Personal Information to respond and address feedback you provide us or if you contact us for support.
- We may use your Personal Information to contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notification, regarding the Service generally as well as regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- We may use your Personal Information to send you marketing communications that promote Symmetry products, programs or services and/or those of our partners (with your consent, where required), and to determine the types of marketing communications to send.
- We may use your Personal Information to analyze your needs and help improve, develop, market, and evaluate the Services, and to develop new products and services.
- We may use your Personal Information to comply with laws and regulations and legal processes.
- We may use your Personal Information to monitor compliance with our policies, procedures and applicable terms of service, for fraud prevention, to detect and address illegal activities and/or to protect Symmetry and its employees, users and property.
- We may use your Personal Information for customer relationship management and administration.
- We may use Device Information to monitor the effectiveness and improve the functionality of the Services, to help personalize your experience and to consider potential improvements to the Services. This information may also be used for statistical and research purposes and administrative purposes including, without limitation, to troubleshoot and resolve problems with the Services. We may rely on third-party partners to collect and analyze the Device Information. Device Information may also be collected through cookies or similar technologies. For more detailed information on cookies, please refer to the "Cookies and Online Interactions" section below.

Use of Your Sensitive Personal Information

With regard to Sensitive Personal Information, we use your Sensitive Personal Information to provide you with the requested products or Services, to administer your account and for legitimate internal business purposes and generally in a manner that cannot be further limited under applicable law.

DISCLOSURE OF YOUR PERSONAL INFORMATION

In addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations, as permitted by applicable law:

- **Affiliates and Acquisitions.** We may disclose information with our corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires, or plans to acquire, our company, business, or our assets, we will also disclose information with that company, including at the negotiation stage.
- **Business Partners.** We may partner with other companies to provide you with products or services on a joint or “co-branded” basis. You should be aware that, in such cases, in addition to this Privacy Policy, the relevant partner’s privacy policy may also apply. Where required by applicable law, Symmetry requires explicit “opt-in” consent for the sharing of certain Sensitive Personal Information with business partners.
- **Compliance with Law or Other Legal Process.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also disclose your information in order to establish or exercise our rights, to defend against a legal claim or protect against legal liability, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the provision of services by a third party intermediary.
- **De-identified or Aggregate Information.** We may aggregate and anonymize information you provide to us in such a way as to ensure it will no longer be identifiable to you. This data may be used for statistical, analytic, and administrative purposes, including analyzing our website traffic and trends, tailoring our Services, or conducting product analysis. We may share anonymized or aggregated data at our discretion, in accordance with applicable laws.
- **Other Users.** When you share Personal Information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **Public Forums.** Our Sites and Apps may provide the opportunity to post comments, or reviews, in a public forum. If you decide to submit information on these pages, that information may be publicly available.
- **Partner Promotion.** We may offer contests, sweepstakes, or other promotions with third party partners. If you decide to enter a contest, sweepstakes, or promotion that is sponsored by a third party partner the information that you provide will be disclosed to us and with them. Their use of your information is not governed by this Privacy Policy.
- **Service Providers.** We disclose your information with service providers. Among other things service providers may help us to administer our Sites and Apps, collect data for analysis purposes, conduct surveys, provide technical support, and process payments.
- **Social Media Platforms and Networks.** Our Sites and Apps may feature plugins, widgets, or and other tools made available by third parties that may result in information being collected or shared between us and the third party. For example, if you use Facebook’s “Like” feature, Facebook may register the fact that you “liked” a page and may post that information on Facebook. Their use of your information is not governed by this Privacy Policy.
- **Third Party Vendors.** We may also disclose Personal Information to Third Party Vendors, such as our external auditors, attorneys, accountants, and similar professionals based on our legitimate interest in the operation of our business and our obligations to comply with applicable laws and regulations. These Third Party Vendors may use your Personal Information to provide services to us and to comply with their legal, regulatory and/or fiduciary obligations.
- **Other Disclosures with Your Consent.** We may ask if you would like us to disclose your information with other unaffiliated third parties who are not described elsewhere in this policy.

CHILDREN’S PRIVACY

Unless otherwise specified, Symmetry's Services are not directed to children under the age of 16 (or the relevant age as defined by applicable law) ("Children" or "Child") and Symmetry does not knowingly collect or distribute Personal Information from Children. Unless otherwise specified, Children are not permitted to use the Services, and we request that Children not submit any Personal Information through the Services. If you believe your Child has impermissibly submitted Personal Information, please contact us to request that such information be removed. Once we are aware of information impermissibly entered by a Child, we will exercise commercially reasonable efforts to remove such information from our systems. We do not knowingly sell the Personal Information of minors under 16 years of age.

COOKIES AND OTHER INFORMATION COLLECTING TECHNOLOGIES

In accordance with applicable law, we may use cookies, web beacons or other tracking technologies (collectively, "Cookies") on our site. A cookie is a small amount of data that is transferred to visitors' web browsers and/or stored on your device as you are browsing; they are processed and stored by your web browser. We may use cookies to improve the Services and provide features that are tailored to your needs. This section describes how we use cookies and how you can manage cookies that are not required to operate our sites and mobile applications.

The information collected by these tracking technologies may include (a) your internet protocol (IP) address, unique device identifiers, location, browser type, and Internet service provider information; (b) information about when and how you access and use our websites or Services, such as the domains you visit, what features you used and for how long, the website that referred you to us, and date/time stamps associated with your usage; (c) information about the device you use to access the websites or Services, such as device type, device ID, and device/browser settings; and (d) location of the device used to access the websites or Services derived from GPS or WiFi use.

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when you go offline, while Session Cookies are deleted as soon as you close your web browser. Learn more about cookies: [All About Cookies](#).

We differentiate between cookies that are essential for the technical features of the Services and optional analytics and advertising cookies.

We may use the following types of cookies on our Site:

Cookie Type	Description
Essential Cookies	These are cookies that our Site needs in order to function, and that enable you to move around and use the Site and features. Without these essential cookies, the Site will not perform as smoothly for you as we would like it to and we may not be able to provide the Site or certain services or features you request. Examples of where these cookies are used include: to determine when you are signed in, to determine when your account has been inactive, and for other troubleshooting and security purposes.
Analytics Cookies	Analytics cookies allow us to understand more about how many visitors we have to our Online Services, how many times they visit us and how many times a user viewed specific pages within our Site. Although analytics cookies allow us to gather specific information about the Site that

	you visit and whether you have visited our Site multiple times, we cannot use them to find out details such as your name or address. We use Google Analytics. For more information about Google Analytics, please refer to "How Google Uses Information From Sites or Apps that Use Our Services", which can be found at www.google.com/policies/privacy/partners/ , or any other URL Google may provide from time to time.
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You can instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if you do not accept Cookies, you may not be able to use some parts of our Service.

We may use the information collected through tracking technologies for several reasons, including:

- To make our Site easier to use.
- To gather metrics about how users interact with our Site.
- For security reasons.

DO NOT TRACK SIGNALS

Some web browsers incorporate a "Do Not Track" (DNT) or similar feature that signals to websites that a visitor does not want to have his/her online activity and behavior tracked. Not all browsers offer a DNT option and there is currently no industry consensus for how to recognize or respond to a DNT signal.

DATA RETENTION

How long we retain your Personal Information depends on the context in which, and purposes for which, we collected it. We generally retain Personal Information for as long as necessary for achieving the purposes for which it was collected or processed, unless a different retention period is required by applicable law.

LINKED THIRD-PARTY SITES

We may provide links to other third-party websites through the Services solely as a convenience to you. However, such linking does not mean, and should not be interpreted to mean, that Symmetry endorses, is affiliated with or makes any representations concerning such third-party websites. Symmetry neither reviews, controls, nor is responsible for these third-party sites or any content therein. By using such links, you will leave the Services. Please note that any Personal Information that you provide to such third parties will be governed by their privacy policies, and we have no control over or responsibility for their privacy practices. If you decide to access any of the third-party sites linked to the Services, you do so entirely at your own risk. Symmetry shall not be liable for any consequences arising from use of any third-party websites to which the Services link. We encourage you to review the privacy policies of any third-party website or application for details about what information is collected and how it is used and/or disclosed prior to providing any Personal Information.

YOUR CHOICES AND RIGHTS

- **Promotional Emails.** You can opt out of receiving marketing or promotional emails by following the unsubscribe instructions contained in marketing or promotional emails you receive from us. If you decide not to receive marketing or promotional emails, we may still send you service or transactional-related communications, such as notices about your account.
 - **Promotional Text Messages.** You can opt out of receiving text messages at any time by replying "STOP," or following the unsubscribe instructions contained in the text message.
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- **Postal Mailings.** If at any time you do not want to receive offers and/or circulars from us you can remove yourself from our mailing lists by emailing us (our contact information is below) with "NO POSTAL MAIL" in the subject line along with your name, and address. Please note that our mailings are prepared in advance of their being sent. Although we will remove your name from our mailing list after receiving your request, you may still receive mailings from us that had been initiated prior to your name being removed.
- **Editing and Sharing Profile Information.** Depending on the Services used, you may have the option to create and edit a profile. You can edit your profile information and review the settings in your profile to ensure you are connected to the appropriate networks and/or confirm whether you have the appropriate profile settings in place.

In certain jurisdictions, such as California, you may also have the following rights with regard to your Personal Information:

- **Right to Request Access to Your Personal Information.** You may request access to your Personal Information by contacting us at the address described below. If required by law, upon request, we will grant you reasonable access to the Personal Information that we have about you. Note that residents of certain jurisdictions may be entitled to ask us for a notice describing what categories of Personal Information (if any) we disclose with third parties or affiliates for direct marketing.
- **Right to Request Deletion of Your Personal Information.** You may request that we delete your Personal Information by contacting us at the address described below. If required by law we will grant a request to delete information, but you should note that in many situations we must keep your Personal Information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes.
- **Right to Request Correction of Your Personal Information.** You have the right to request that we correct or supplement any inaccurate or incomplete Personal Information we process about you. Depending on the purposes of the processing, you may have the right to have incomplete Personal Information completed, including by means of providing a supplementary statement.
- **Right to Data Portability.** In certain circumstances, you have the right to request that we provide the Personal Information which you provided to us in a structured, commonly used and machine-readable format; and you have the right to transmit such Personal Information to another entity.
- **Right of Non-Discrimination/Retaliation.** We do not discriminate against individuals who exercise any of their rights described in this Privacy Policy, nor do we retaliate against individuals who exercise these rights. However, Symmetry may require use of your Personal Information to provide access to the Services. Therefore, when you exercise your deletion right, in particular, you may lose access to certain aspects of the Services that require your Personal Information.
- **Right to Opt Out of Our Use of Your Sensitive Personal Information (in certain instances and if permissible under applicable law).** You have the right to request the restriction of processing of your Sensitive Personal Information. However, we do not use or disclose Sensitive Personal Information for purposes other than those expressed in this Privacy Policy or as otherwise permitted by applicable law, and these uses cannot be limited under applicable law.

If you choose to assert any of these rights under applicable laws, we will respond within the time period prescribed by applicable law. Please note that many of the above rights are subject to exceptions and limitations. Please note that you may be located in a jurisdiction where we are not obligated to fulfill a request. In such a case, your request may not be fulfilled. To the extent permitted by applicable law, we may reject requests that are unreasonably repetitive, unduly burdensome, risk the privacy of others, or would be very impractical to honor. If we are not able to provide the requested information or make the change you requested, you will be provided with the reasons for such decisions.

Your request must: (i) provide sufficient information that allows us to reasonably verify that you are the person about whom we collected Personal Information or an authorized representative of that

person; and (ii) describe the request with sufficient detail that allows us to properly understand, evaluate, and respond to it. Our verification process may include a request for additional information to confirm your identity or your authorized agent's identity (such as your name, email address and date of birth) or to obtain proof that you have given your authorized agent permission to act on your behalf. If our verification process is successful, we will respond to your request within the time and in the manner required by applicable law. If we cannot validate the identity of you and/or your authorized agent or obtain proof that you have given your authorized agent permission to act on your behalf, we will attempt to contact you to inform you.

If you designate an authorized agent to submit requests to exercise certain privacy rights on your behalf, we will require verification that you provided the authorized agent permission to make a request on your behalf. You must provide us with a copy of the signed permission you have given to the authorized agent to submit the request on your behalf and verify your own identity directly with us. If you are an authorized agent submitting a request on behalf of an individual, you must attach a copy of a completed Authorized Agent Designation Form (or equivalent form) indicating that you have authorization to act on the individual's behalf.

Symmetry provides two mechanisms that allow you to submit requests to exercise these rights. You can submit such requests by (1) email to help@quility.com or (2) calling our toll-free number at 888-784-5489.

HOW WE PROTECT PERSONAL INFORMATION

Protecting your Personal Information is important to us. While we strive to maintain the security of your information by using appropriate measures designed to protect our systems, no method of transmission over the Internet, or method of electronic storage is 100% secure, and we cannot guarantee the security of any information that is disclosed online.

If you choose to create an online account, you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

MODIFICATIONS TO OUR PRIVACY POLICY

From time to time, we may update and post revisions to this Privacy Policy. Any changes will be effective immediately upon the posting of the revised Privacy Policy. We encourage you to review this page periodically for the latest information on our privacy practices. This Privacy Policy was updated as of the effective date listed above.

CONTACT INFORMATION

If you have questions or concerns regarding this Policy, would like to access the Policy in an alternative format, please contact us by email at help@quility.com, or by one of the following additional methods:

By calling us at 888-784-5489, or by writing to us at:

Symmetry Financial Group, LLC
204 Whitson Avenue
Swannanoa, NC 28778

Privacy Rights. If you wish to exercise any individual rights you may have, submit your privacy requests by emailing us at help@quility.com.
