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## FT INDEXING SOLUTIONS LLC ("FTIS") PRIVACY POLICY

FTIS values its relationship with you and considers your privacy a priority in maintaining that relationship. We are committed to protecting the security and confidentiality of your personal information while providing you with the products/services you request or authorize.

### SOURCES OF INFORMATION

We collect nonpublic personal information (NPPI) about you from the following sources:

- Information about your transactions with us, our affiliates or other third-parties;
- Information we receive from your inquiries by mail, e-mail or telephone; and
- Information we collect on our website through the use of "cookies". For example, we may identify the pages on our website that your browser requests or visits.

### INFORMATION COLLECTED

FTIS's clients and prospects are companies, not individuals, investors, or consumers. FTIS's vendors, service providers and consultants are typically companies but on occasion may be individuals.

We process personal information that comes from the following sources: information you provide (including through our website), information we receive from other sources and information we collect automatically (including from public sources, information from our affiliates, and information from our customers), and information we collect automatically when you visit our website or use our IT systems/networks.

Such information may include name, address, telephone number, email address, website, and potentially other personally identifiable information.

### DISCLOSURE OF INFORMATION

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. In addition to using this information to verify your identity (as required under law), the permitted uses may also include the disclosure of such information to unaffiliated companies for the following reasons:

In order to provide you with services, we may disclose your personal information as described above to unaffiliated financial service providers and other companies that perform administrative or other services on our behalf.

We may release information we have about you if you direct us to do so, if we are compelled by law to do so, or in other legally limited circumstances (for example to protect your account from fraud).

In addition, we may share your personal information within FTIS.

## **PROTECTION OF NPPI COLLECTED**

FTIS protects your NPPI from unauthorized access and use through security measures that comply with federal law, including computer safeguards, and secured files and buildings.

## **USE OF WEBSITE ANALYTICS**

We currently use third party analytics tools, Google Analytics and Matomo to gather information for purposes of improving FTIS's website and marketing our products and services to you. These tools employ cookies, which are small pieces of text stored in a file by your web browser and sent to websites that you visit, to collect information, track website usage and viewing trends such as the number of hits, pages visited, videos and PDFs viewed and the length of user sessions in order to evaluate website performance and enhance navigation of the website. We may also collect other anonymous information, which is generally limited to technical and web navigation information such as the IP address of your device, internet browser type and operating system for purposes of analyzing the data to make FTIS's website better and more useful to our users. The information collected does not include any NPPI unless you voluntarily provide that information through the website for us to contact you in order to answer your questions or respond to your requests. You should not provide NPPI on our website if you do not want your information to be used by these services. To find out how to opt-out of these services click on: [Google Analytics](#) and [Matomo Analytics Platform](#).

We may use reCAPTCHA on certain pages of our website to help protect against automated abuse, spam and fraudulent activity. reCAPTCHA works by collecting certain technical information from your browser, such as your IP address, cookies, browser type, device information, and interaction data, to determine whether a request is coming from a human user or an automated program. This information is processed by Google on our behalf solely for the purpose of security, fraud and abuse prevention, and is not used for advertising or any other related purpose.

## **CONFIDENTIALITY AND SECURITY**

With regard to our internal security procedures, FTIS restricts access to your NPPI to only those FTIS employees who need to know such information to provide products or services to you. We maintain physical, electronic and procedural safeguards to protect your NPPI.

## **POLICY UPDATES AND INQUIRIES**

We reserve the right to modify this policy at any time, however, if we do change it, we will tell you promptly. For example, we may place a prominent notice on our website site or email you to let you know of an updated policy. For questions about our policy, or for additional copies of this notice, please go to [info@ftindexingsolutions.com](mailto:info@ftindexingsolutions.com).

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