

**Hewitt Financial Services LLC
Privacy Statement**

WE RESPECT YOUR PRIVACY

We at Hewitt Financial Services (“HFS”) appreciate that you have provided us with your personal financial information. We strive to maintain the privacy of such information. This Privacy Statement describes what non-public personal information we collect about you, why we collect it, and when we may share it with others.

Throughout this Privacy Statement, we refer to the non-public information that personally identifies you as “personal information.”

PERSONAL INFORMATION COLLECTED BY HFS

To serve you better, HFS must collect and maintain accurate non-public information that personally identifies you (“Personal Information”) about you. We obtain this information from applications and other forms you submit to us, from your dealings with us, from consumer reporting agencies, from our Web sites, and from third parties and other sources. For example:

- We collect the following kinds of Personal Information through applications and other forms you submit to us:
 - Identifier and contact information such as your name, date of birth, address, e-mail address, telephone/fax numbers, Social Security Number, mother’s maiden name;
 - Information about your beneficiaries, including, for example, name, Social Security Number, date of birth, address, and telephone numbers;
 - Financial information such as your income, net worth, and tax bracket; and
 - Banking information such as the name of your bank, its contact information and routing number, the type of account you have, and the identification number of those accounts.
- We collect Personal Information about your transactions with HFS, such as your account balance, account activity, and investment history.
- We collect information about your use of products and services offered by our affiliates, including Hewitt Associates LLC (collectively, “Hewitt Affiliates”).
- We may obtain Personal Information about your creditworthiness and credit history from consumer reporting agencies.
- We may collect Personal Information from other sources in connection with providing or servicing your account.
- Through our Web sites, we may collect Personal Information that you provide directly through online communications (such as an e-mail address). We may also collect Personal Information about your Internet service provider, your domain name, your computer’s operating system and Web browser, your use of our Web sites and your product and service preferences, through the use of “cookies.” “Cookies” recognize your computer each time you return to one of our sites, and help to improve our sites’ content and personalize your experience on our sites by, for example, suggesting offerings that may interest you.

PERSONAL INFORMATION DISCLOSED BY HFS

To provide you with the products and services you request, to serve you better, and to manage our business, we may disclose Personal Information about you as required or permitted by law.

Third Party Financial Service Providers: In order to provide the investment products and services you have requested, we disclose Personal Information about you to financial institutions (“Third Party Financial Service Providers”), such as our clearing broker, Pershing LLC as required to meet our obligations to you or as permitted by law.

PLEASE NOTE: When you sign up for a financial product or service offered through HFS, the Third Party Financial Service Provider will acquire Personal Information about you, including from HFS, from you, and from third parties. The third-party financial service provider’s use of your Personal Information, including the personal information disclosed by HFS, is governed by a separate privacy policy. HFS urges you to review these privacy policies carefully and to exercise any choices you may have about how Third Party Financial Service Providers use and disclose your Personal Information.

Hewitt Affiliates: In order to manage your account(s) effectively, including servicing and processing your transactions, to let you know about products and services offered by us, our affiliates, and others, and as otherwise required or permitted by law, we may disclose Personal Information about you to Hewitt Affiliates.

Other Third Parties: Except as described above, we do not disclose Personal Information to non-affiliated third parties except to enable them to provide the products or services you have requested, to provide various other services on our behalf, or as otherwise required or permitted by law. For example, some instances where we may disclose Personal Information about you to third parties include: for servicing and processing transactions, to protect against fraud, for institutional risk control, to respond to judicial process or to perform services on our behalf. When we share Personal Information about you with these companies, they are required to limit their use of that information to the particular purpose for which it was shared and they are not allowed to share it with others except to fulfill that limited purpose.

We respect your privacy and do not share your Personal Information with third parties for marketing purposes.

PROTECTING YOUR PERSONAL INFORMATION.

We maintain physical, electronic and procedural security measures to help safeguard the Personal Information we collect about you. We have internal policies governing the proper handling of Personal Information. We require third parties that provide support or marketing services on our behalf to adhere to confidentiality standards with respect to such information.

CONTACT INFORMATION

If you have any questions or complaints about HFS’s use of your Personal Information or about this Hewitt Financial Services Privacy Statement, please send an email to: dataprivacy@hewitt.com.

HFS RESERVES THE RIGHT TO AMEND THIS HEWITT FINANCIAL SERVICES PRIVACY STATEMENT AT ANY TIME. WE WILL INFORM YOU OF ANY CHANGES TO THIS PRIVACY STATEMENT AS REQUIRED BY LAW.