

PRIVACY POLICY

Last Update: December, 2018

This Privacy Policy describes our privacy policy and how we collect and process personal information about you, how this information is protected, and your rights. Unless stated otherwise in this Privacy Policy, the terms "us", "we" or "our" refers collectively to GenTrust, LLC ("GenTrust").

PURPOSE AND SCOPE

We collect personal information about you to enter into or fulfil our contractual obligations with you. We are also required by law to collect and use certain personal information about you, for example, we obtain proof of your identity to enable us to meet our anti-money laundering obligations; and we obtain certain information such as your tax status, investment objectives or risk tolerance to satisfy our suitability obligations.

PERSONAL INFORMATION WE COLLECT

The categories of information that we collect about you are:

- personal details (e.g. name, date of birth, social security or tax ID number);
- contact details (e.g., address, telephone number, email); and
- employer name.

You should be aware that failure to provide this information may prevent or delay the fulfilment of our contractual obligations to you.

USE OF YOUR PERSONAL INFORMATION

We use your personal information to:

- deliver contracted services to you;
- respond to your inquiries or requests for information;
- maintain our accounts and records;
- communicate with you about the products and services that you use, or we offer;
- comply with our legal or regulatory requirements.

INFORMATION FOR EUROPEAN UNION RESIDENTS

Under EU privacy law, we must have a legal basis to process personal information. In most cases the legal basis for our processing, under EU law, will be, as described above, to:

- fulfil our contractual obligations to you, or
- comply with our legal and/or regulatory obligations

When we process your personal information, we have in place commercially reasonable safeguards designed to protect your privacy interests and rights under applicable laws.

Some of the processing we conduct may involve making decisions about you based on automated processing of your personal information. We may obtain your consent to collect and use certain types of personal information when we are required to do so by law. If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us.

Failure to provide your consent may prevent or delay the fulfilment of our contractual obligations with you.

SHARING OF YOUR PERSONAL INFORMATION

We share your personal information with third party service providers in connection with delivering contracted services to you. These third party service providers include: securities broker-dealers, investment advisors, custodians, banks, auditors, attorneys, consultants, or other professional and technical service providers, or suppliers.

In addition, we will share information, as necessary and required by law:

- to cooperate with regulatory or government authorities;
- to comply with a court order or subpoena;
- when such disclosures will help support our detection of, prevention of, or response to fraud; help protect your safety or security; or protect the safety and security our services.

TRANSBORDER DATA TRANSFERS

The third party service providers described above may be located outside the jurisdiction in which you are located. We may transfer, process, and store your personal information outside of your home country, which may not have the same level of data protection as your home country. If you are resident in the EU this may include the transfer of your personal information from within the EU to a country outside of the EU.

We use contractual and other commercially reasonable safeguards to ensure that the recipients thereof provide a comparable standard of protection to your personal data. We have put in place appropriate commercially reasonable and practicable safeguards for such transfers. If you would like additional information regarding the safeguards in place please contact our Data Protection Officer at the number listed below.

DATA QUALITY

We will take reasonable steps to make sure that the personal data we collect, use or disclose is accurate, complete and up to date.

INFORMATION SECURITY

We have put in place commercially reasonable steps and safeguards to maintain data security with respect to your personal information and protect the personal data we hold from misuse and loss and from unauthorized access, modification or disclosure. Despite these measures, however, we cannot guarantee that your data will be secure.

DATA RETENTION PERIOD

We retain your personal information for as long as we have a relationship with you and for a period after the relationship has ended. We will not keep personal data for longer than is necessary and will take reasonable steps to destroy your personal data if it is no longer needed or required to be maintained. When determining how long to keep your personal information after our relationship with you has ended, we must take into account how long we will need to retain the information to fulfill the purposes described above and comply with regulatory obligations including the U.S. Securities and Exchange Commission's record retention requirements. Please contact us if you would like more information about the retention period and destruction methods.

YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION

Subject to local law, you may have certain rights regarding your personal information. This can be done by you making a written request to us. We reserve the right to charge a fee (representing our costs in administering your request) for supplying such information and to refuse requests which, in our opinion, occur with unreasonable frequency. These rights may include, depending on the circumstances, the right to:

- access your personal information;
- rectify the personal information we maintain about you;
- restrict the use of your personal information;
- withdraw any consent you may have given us to use your personal information;
- object to our use of your personal information;
- receive your personal information in a usable electronic format;
- transmit your personal information to a third party (also known as the right of data portability); or
- file a complaint with your local data protection authority.

We will also, as applicable and appropriate, where you have requested that we correct an error or omission in the personal data about you that is kept by us, correct such data as soon as practicable and as appropriate, send the corrected personal data to every organization to which the personal data was sent before it had been corrected, unless that organization does not need the corrected personal data for any legal or business purpose.

We may however, subject to legal and regulatory requirements, may not provide you with access to or correct such information under certain circumstances such as in situations where we:

- are satisfied on reasonable grounds that the correction should not be made;
- deem the request for access as frivolous, or the information requested as trivial;
- determined that the personal data, if disclosed, would reveal confidential commercial information that could, in the opinion of a reasonable person, harm our competitive position;
- find that the personal data is related to an investigation, prosecution, or other legal proceeding and all the related proceedings or appeals have not been completed.

If you would like to discuss or exercise any rights you may have, please contact our Data Protection Officer at the number listed below.

USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES

We may use 3rd party automated collection tools on our website such as cookies that capture information sent from your web browser to our website. Information that is collected includes your IP address, the website address that you were at before landing at our website, and information such as the pages you clicked through while at our website. This information is collected to improve your experience and offer services to you. You can refuse the use of cookies by selecting the appropriate browser setting. If you opt-out, please note that your experience using the site may not be optimal.

LINKS TO THIRD PARTY WEBSITES

We may from time to time provide links to third party websites in our website or other communications as a convenience to you. Such links are not intended as an endorsement of or referral to any linked websites. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which these third parties operate their websites, or how they may collect, use or disclose, secure and otherwise treat your personal information. We recommend you read carefully the privacy statements, notices and terms of use of any linked websites.

CHANGES TO OUR PRIVACY STATEMENT

From time to time, we may update our Privacy Policy. If we change our Privacy Policy, we will notify you of the changes and provide you with an updated copy of our policy. If at any time you choose not to accept the terms of this Privacy Policy, we request that you notify us by contacting our Data Protection Officer at the number listed below. Please be aware this may prevent our ability to fulfill our contractual obligations

QUESTIONS

If you have any questions or concerns about our Privacy Policy, please contact our Data Protection Officer at 305-677-6687, email info@gentrustwm.com.