

# **General Privacy Policy**

Last modified: May 5, 2020

#### Introduction

NorthRock Partners LLC ("NorthRock" or "We") respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website <a href="www.northrockpartners.com">www.northrockpartners.com</a> and our client portal at both <a href="https://www.northrockpartners.com/client-login/">https://www.northrockpartners.com/client-login/</a> and <a href="https://bd3.bdreporting.com/#/">https://bd3.bdreporting.com/#/</a> (our "Website"), and our practices for collecting, using, maintaining, protecting, and disclosing that information.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. By using the Website, you accept and agree to be bound and abide by this policy. If you do not agree to this policy, you must not access or use the Website.

We may revise and update this policy from time to time in our sole discretion. All changes are effective immediately when we post them. Your continued use of the Website following the posting of revised policy means that you accept and agree to the changes. You are expected to check this page from time to time so you are aware of any changes, as they are binding on you.

# Children Under the Age of 16

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at <a href="info@northrockpartners.com">info@northrockpartners.com</a>.

## Information We Collect About You and How We Collect It

We may collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, postal address, social security number, e-mail address, telephone number, account balances, assets, income, transaction history, tax return information, and any other identifier by which you may be contacted online or offline ("personal information");
- That is about you but individually does not identify you; and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

We may collect this information:

Directly from you when you provide it to us, for example, when you open an account, deposit
money, seek advice, enter an investment advisory contract, share your investment or
retirement portfolio or earnings.

- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies.
- From third parties, for example, our business partners or other outside financial institutions or custodians that may work with you.

#### **Information You Provide to Us**

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. We may also ask you for information when you enter a contest or promotion sponsored by us and when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses) if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Website.
- Your search queries on the Website.

## **Information We Collect Through Automatic Data Collection Technologies**

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

The information we collect automatically may include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service.

#### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us or may be of interest to you.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account.

- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide though it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

#### **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect, or you provide as described in this privacy policy:

- To our subsidiaries and affiliates, for example, NorthRock Partners Tax Services, LLC.
- To contractors, service providers, and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- · With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use <a href="https://www.northrockpartners.com/legal/NorthRockPartnersTermsOfUse.pdf">https://www.northrockpartners.com/legal/NorthRockPartnersTermsOfUse.pdf</a> and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of NorthRock, our customers, or others.

## **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. To request access to, correct or delete, or opt-out of certain personal information uses or disclosures, please send us an email at <a href="mailto:info@northrockpartners.com">info@northrockpartners.com</a>. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

# **Your California Privacy Rights**

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. Should you have any questions or requests, please send us an email at info@northrockpartners.com.

## **Data Security**

Unfortunately, the transmission of information via the internet is not completely secure. Although we try to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

# **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this privacy policy to check for any changes.

#### **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at:info@northrockpartners.com.