

RIVERFRONT ONLINE PRIVACY STATEMENT

RiverFront Investment Group (“RIG,” “we,” “our,” or “us”) is a registered investment advisor that provides investment and asset management services (the “Services”). We take the privacy of our clients, our partner financial advisors, and those visiting our website (“you” or “user”) very seriously. Please read this Privacy Statement carefully to learn how we collect, use, share, and otherwise process information.

This Privacy Statement applies to information that we collect:

- through websites operated by us from which you are accessing this Privacy Statement, www.riverfrontig.com (collectively, the “Website”);
- through social media pages that we control from which you are accessing this Privacy Statement (collectively, our “Social Media Pages”);
- through HTML-formatted email messages that we send you that link to this Privacy Statement and through your communications with us; or
- when we provide you with any investment advice or asset management services (“Management Services”). Note: if you have a financial product or service with us, we will use and share your personal information in accordance with our privacy notice, which is available upon request.

Collectively, we refer to the Website, our Social Media Pages, the Emails we send or receive, and our Management Services as the “Services.” By using the Services, you agree to the terms and conditions of this Privacy Statement.

This Privacy Statement is incorporated into, and part of, our Terms of Use and applies to information collected in connection with our Services regardless of how you interact with us – online, mobile, or in any other manner. To the extent there is a conflict between this Privacy Statement and our Terms of Use, the provisions of the Terms of Use supersede and control.

1. ACCEPTANCE OF PRIVACY STATEMENT

Each time you access, use, submit information on, or browse the Website, you signify your acceptance of the then-current Privacy Statement. If you do not accept this Privacy Statement, you are not authorized to use the Website and must discontinue use of the Website immediately. If you provide personal information to RIG offline, RIG asks that you review this Privacy Statement, which also governs information collected offline.

2. COLLECTION OF INFORMATION

2.1 – Personal Information

RIG collects personal information from you at various places and through various mechanisms when you use our Services. This may include, for example, when your financial advisor provides your personal information to us, when you invest with RIG, when you provide your information to us for any reason, when you request information or materials from us, or when you communicate with us about questions or other matters. We may collect personal information from you through our online services. For example, you may provide us with your name, mailing address, phone number, email address and other information when you fill out a form on our website to subscribe to RiverFront commentary and other publications.

Personal information is only collected if you voluntarily provide such information to RIG. Such information may include, without limitation, your first, middle and last name, maiden name, marital status, date and place of birth, current and former home addresses, email addresses, telephone numbers, income and asset information, account transaction information, driver’s license information and state/governmental

identification number (where permitted by law), tax and withholding information, Social Security number, and other information that is not otherwise publicly available.

RIG also may acquire personal information about you from other sources, such as Service Providers (as defined below in Section 5.1), vendors and other third parties, that may share information as permitted in their privacy policies. This Privacy Statement **does not** apply to personal information about you that we receive from other sources. However, if we combine information that we collect through other sources with personal information covered under this Section 2.1 in a manner that associates it with your name and contact information, we will use such information in accordance with the stricter of applicable law or the terms of this Privacy Statement.

2.2 – Non-Personal Information

Non-personal information refers to data and information that does not personally identify you as the individual to whom the data or information relates, which may include data and information that (i) is aggregated (that is, relates to a group of individuals) by RIG or a third party (“aggregated non-personal information”), or (ii) is not linked to personal information (“de-identified non-personal information”). In either case, non-personal information does not personally identify the individual to whom the information or data collected relates. Non-personal information may include, without limitation, your media access control (MAC) address, Collection Technology (as defined below) information, type of computer or device you use, the operating system you use (e.g., Microsoft Windows, Mac OS, or Google Chrome), the type of browser you use (e.g., Firefox, Chrome, Internet Explorer, or Safari), the domain name of the Internet service provider, your activities while visiting or using the Website and the content you access or view, the time of your visit to or use of the Website, the pages you visit and the time spent on the pages, your general geographic location such as the city from which your computer or device is connecting to the Internet, information regarding the Website you visit prior to and after visiting the Website, and information regarding your Internet location when you see RIG’s ads and whether you click on such ads.

2.2.1 – Cookies And Other “Collection Technology”

Non-personal information may be collected in a variety of ways, but Collection Technology is often used. “Collection Technology” refers to cookies, web beacons, pixels, gifs, tags, and other technologies that collect information in similar ways. Collection Technology such as a cookie may store a piece of data on your browser or device, while other forms of Collection Technology may identify your browser or device and/or collect information through other means. When you visit the Website, or visit another website or application, your browser or device may be exposed to Collection Technology and Collection Technology may be stored on your browser or device. RIG may come to acquire non-personal information about you upon collection of the non-personal information or some time thereafter.

RIG uses cookies, including third-party cookies, for a number of reasons, such as protecting your data and account, helping us see which features are most popular, counting visitors to a page, improving our users’ experience, keeping our services secure, providing relevant advertising, and generally providing you with a better customer and user experience. The cookies we use generally fall into one of the following categories.

- **Necessary Cookies:** We use these cookies to run our site, and to identify and prevent security risks. For example, we may use these cookies to store your session information to prevent others from changing your password without your username and password.
- **Preference Cookies:** We use these cookies to remember your settings and preferences, and to improve your experience on our site. For example, we may use these cookies to remember your language preferences.

- **Performance Cookies:** We use these cookies to collect information about how you use our site, monitor site performance, and improve our site performance, our services, and your experience. For example, we can use these cookies to learn more about which features are the most popular with our users and which ones might need some tweaks.
- **Marketing Cookies:** We use these cookies to deliver advertisements, to make them more relevant and meaningful to consumers, and to track the efficiency of our advertising campaigns, both on our services and on other sites or mobile apps.

If you do not want data collected with cookies, you can learn more about controlling cookies at:

<http://www.allaboutcookies.org/manage-cookies/index.html>.

You may also delete and/or refuse the use of certain Collection Technologies by selecting the appropriate settings on your browser. You may use the public portion of the Website even if you choose to refuse or delete such Collection Technologies; however, please note that you will not be able to access advisor only content on our website or the RiverFront Model Marketplace provided by ETF Action if you delete or refuse the use of Collection Technologies.

2.2.2 – Analytics Services

The Website may use analytics services provided by third parties, such as Google Analytics and Moz, among others. These analytics services use Collection Technology to collect and store information about you and your use of the Website, which may include the personal and non-personal information described above.

You can read Google's Privacy Statement, which applies to Google Analytics, at <http://www.google.com/intl/en/policies/privacy/>. You also can opt-out from being tracked by Google Analytics in the future by downloading and installing Google Analytics Opt-out Browser Add-on for your current browser <https://tools.google.com/dlpage/gaoptout>. You can read Moz's Privacy Statement, which applies to Moz analytics, at <http://moz.com/privacy-policy>.

3. LINKING TO OTHER SITES

Our Website may contain third-party links, include third-party integrations, or offer a co-branded or third-party-branded service (collectively, "Other Links and Sites"). Through these Other Links and Sites, you may be providing information (including personal information) directly to the third party (which may include certain Service Providers), us, or both. Because these Other Links and Sites may not be hosted or controlled by RIG, however, we are not responsible for the privacy practices of those Other Links and Sites or the content provided thereon. Collection Technology also may be used by some of those Other Links and Sites. Therefore, the privacy policies with respect to these areas may differ from those applicable to the Website, and we encourage you to review the privacy policies of each of those Other Links and Sites.

4. SOCIAL MEDIA

Generally, online social media resources are interactive tools that enable you to collaborate and share information with others. Social media resources include, but are not limited to, social networks, discussion boards, bulletin boards, blogs, wikis, and referral functions to share web site content and tools with a friend or colleague. RIG may collect personal information to enable you to use our Social Media Pages or online social media resources offered by a third party. We may also enable you to use our Social Media Pages or other social media resources to post or share personal information with others.

If you use an online social media resource offered by a Third Party Social Media Resource ("Third Party SMR") through the RIG Site or interact with any RIG social media account, you acknowledge that RIG may be able to access any information you make public through such Third Party SMR (such as your username, comments,

posts, and contacts) and other information your privacy settings on such Third Party SMR permit RIG to access. RIG will comply with the terms of this Privacy Statement and the privacy policies applicable to the social media resources it uses.

5. USE, SHARING, AND DISCLOSURE OF PERSONAL INFORMATION

RIG may use your personal information to:

- provide you with Services;
- process transactions that you have requested;
- develop, operate, improve, deliver, maintain, and protect our Website and Services;
- send you communications, including by email;
- process any applications, forms, requests, inquiries, or other information you submit through the Website;
- administer and process investments or payments;
- attend to tasks relating to your transactions and account with RIG;
- provide customer service;
- update account information;
- inform you of events, programs, products or services that may be of interest to you;
- customize the content or functionality of our Website to your preferences;
- respond to your communications; and
- manage your investment account or portfolio.

By providing your personal information to us, you authorize RIG to transmit email and direct mail to you, call you, including with an automated telephone dialing system, send push notifications to your device, send you text messages, and otherwise contact you concerning these matters.

Your personal information will be intentionally disclosed to third parties as follows:

5.1— Disclosures to Third-Party Service Providers

RIG may provide your personal information to third parties who work on behalf of or with RIG including, without limitation, persons or firms that perform support services for us, such as Sponsor Firms; broker dealers; attorneys; accountants; auditors; consultants or consulting firms who are evaluating our business or are assessing our compliance with industry standards; and record keeping companies (“Service Providers”). These Service Providers may use your personal information as provided in the first paragraph under Section 5 above to help RIG administer the Services, including, but not limited to, providing brokerage services and asset and accounting reconciliations, administering the Website, managing Social Media Pages, complying with governmental or quasi-governmental reporting; providing customer service; or communicating with you about offers, events, programs, or other information relevant to RIG. We may also share your personal information with Service Providers to provide general functions on our behalf relating to the Website and Services. Prior to disclosing your personal information, we enter into contractual agreements with these Service Providers that prohibit them from disclosing or using your personal information other than to carry out the purposes for which we disclose the information.

5.2 – Disclosures Under Special Circumstances

RIG may provide information about you in response to or to cooperate with law enforcement, government, quasi-governmental and public agency requests or reporting requirements, subpoenas, court orders or legal process; to respond to your requests for customer service or other information; to establish or exercise our

legal rights or defend against legal claims; or to protect the safety or property of RIG or others. RIG also may provide information about you if RIG believes it is necessary to share information to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required or permitted by law.

5.3 – Major Transactions

RIG reserves the right to transfer any and all information, including, without limitation, personal information, to any RIG affiliate or a third party or successor in the event of any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations (including, without limitation, in connection with bankruptcy or any similar proceedings).

5.4 – Other Purposes

We may use your information for other purposes specifically disclosed to you at the time we request your information. By providing your information, you consent to all disclosed uses.

6. USE, SHARING, AND DISCLOSURE OF NON-PERSONAL INFORMATION

RIG and its Service Providers may use your non-personal information in a variety of ways, such as to administer the Website, improve the Website, improve navigation of the Website upon your return visit, in relation to or to improve the Services we offer, analyze and develop advertisements and fundraising campaigns, provide you with special offers and promotions and determine their effectiveness, customize the content or functionality of the Website to your preferences, and analyze trends and site usage.

RIG also may use non-personal information to present you with targeted content and advertisements based on your past visits to the Website and to determine the effectiveness of and optimize content and advertisements, analyze your interactions with the content and advertisements you are presented with, and how those interactions relate to your visits to the Website.

If you prefer not to receive targeted advertisements from us, as described above, please email WebsitePrivacy@riverfrontig.com.

RIG may share or disclose your non-personal information with or to employees and Service Providers to perform the tasks described in Sections 5 and 6. RIG also may use, disclose, or share your non-personal information for our business purposes and other purposes consistent with applicable laws. If any aggregated non-personal information or de-identified non-personal information becomes identifiable to a person, RIG will treat such information as personal information.

7. PROTECTION OF PERSONAL INFORMATION

We have implemented reasonable and technically feasible physical, technical, and administrative safeguards to secure your personal information from accidental loss and from unauthorized access, use, alteration or disclosure. We follow generally accepted industry standards to protect personal information submitted to us by users, both during transmission and once we receive it.

Please be aware, however, that the Website and data storage are run on software, hardware and networks, any component of which may, from time to time, require maintenance or experience problems or breaches of security beyond RIG's control. No transmission of data over the internet or method of electronic storage is guaranteed to be 100% secure.

8. NOTICE OF PRIVACY RIGHTS OF CALIFORNIA RESIDENTS

8.1 – California "Shine the Light" Disclosure and CCPA

California residents are protected as “consumers” by the California Consumer Protection Act (“CCPA”) with respect to personal information, subject to certain statutory exceptions set forth in CCPA.

RIG does not sell or share personal information with third-parties for their marketing purposes. Under California S.B. 27 (“Shine the Light” Law), California residents have the right under certain circumstances to receive, once a year, information about third parties with whom we have shared information about you or your family for their marketing purposes during the previous calendar year, and a description of the categories of personal information shared. Under the CCPA, California residents may request this information twice a year. To make such a request, please send an email to WebsitePrivacy@riverfrontig.com and please include the phrase “California Privacy Request” in the subject line, along with your name, address, and email address. We will disclose and deliver to you free of charge this information in response to a verifiable request within forty-five days of receiving such a request.

Under CCPA, California residents have:

1. the right to request disclosure of collection and sales practices in connection with the consumer’s personal information, including categories of personal information collected, source of the information, use of the information and, if the information was disclosed or sold to third parties, the categories of personal information disclosed or sold to third parties and the categories of third parties to whom such information was disclosed or sold;
2. the right to request a copy of personal information collected during the preceding 12 months (subject to certain requirements such as verification of identity);
3. the right to request such information deleted (subject to certain requirements and exceptions)
4. the right to opt-out of the sale of your personal information by a business. We do not, and will not, sell your personal information.
5. the right to not be discriminated against because you exercise any of your rights under the CCPA in violation of Cal. Civ. Code §1798.125.
6. the right to designate an authorized agent to make requests under the CCPA on your behalf if you sign a written declaration stating such and the authorized agent is a natural person or business entity registered with California’s Secretary of State.

8.2 – Types of Information Collected about California residents

We have set out below categories of personal information we have collected about California residents in the preceding 12 months and, for each category of personal information collected, the categories of sources from which that information was collected, the business or commercial purposes for which the information was collected, and the categories of third parties with whom we shared the personal information.

Section 1	
Category of Personal Information	Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, phone number, date of birth, social security number, driver’s license number, passport number, username, passwords, fingerprints, signature, tax information, physical characteristics or picture, bank account number, or other similar identifiers.
Business or commercial purposes for collection of this data	<p><i>Clients/job applicants/ employees/independent contractors/other third parties</i></p> <ul style="list-style-type: none"> • To provide services and to respond to inquiries. • To manage our business operations and administer our client relationship. • To provide relevant marketing to you (e.g., information about events or services that may be of interest). • To address compliance and legal obligations (e.g., checking identity of new clients, prevention of fraud/money laundering). • To consider individuals for employment and contractor opportunities and manage on-boarding procedures.

	<p><i>Employees</i></p> <ul style="list-style-type: none"> • Administering and providing compensation, benefits and other work related allowances. • Administering the workforce (e.g. managing work activities, performance evaluations and promotions, preparing corporate organization charts, managing entity and intra-entity staffing and team management, managing and monitoring business travel, carrying out workforce analysis, talent management and career development, managing employee leave, succession planning, providing employment references, administering ethics and compliance training, facilitating and providing services for the re-location and movement of employees and their families locally and internationally. • Complying with employment law obligations. • Subject to applicable laws, monitoring use of the firm's technology systems, databases and property, conducting investigations. • Administration of the compliance hotline. • Communicating with employees and their designated contacts in the event of an emergency. • Responding to legal and/or regulatory requests for information. • Complying with corporate financial responsibilities (audit, accounting, and tax requirements). • Managing corporate information technology (e.g. IT support, corporate directory, IT security). • Conducting security screenings (to the extent permitted by law) <p><i>Internet Protocol Address</i></p> <p>See Section 6 below for details.</p>
Personal information has been collected from these categories	From the data subject, our affiliates, counterparties to transactions or disputes with the data subjects, employers, agents or professional advisers authorized to disclose data on behalf of the data subject and from other publicly available or subscription based sources.
Personal information has been shared with these third parties	<ul style="list-style-type: none"> • RiverFront Investment Group Affiliates • Suppliers and service providers where necessary to perform functions on RiverFront's behalf (e.g., infrastructure/IT services providers, providers of services relating to client intake, global travel, finance, customer relationship management, business analytics and marketing and conference and event hosting). • Financial institutions (for invoicing and payment). • Corporate purchasers – as part of any sale of Firm assets, transition of service to another provider, or in the event of insolvency or bankruptcy. • Mandatory disclosures and legal claims (e.g., to comply with any subpoena, court order, or other legal process; or to comply with any regulatory, governmental or other legally binding request).
Section 2	
Category of Personal Information	Any categories of personal information described in subdivision (e) of Section 1798.80: "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records."
Business or commercial purposes for collection of this data	See Section 1 above
Personal information has been collected from these categories	See Section 1 above
Personal information has been shared with these third parties	See Section 1 above
Section 3	
Category of Personal Information	Characteristics of protected classifications under California or federal law (classes include race, color, religion, national origin, sex [including pregnancy, childbirth, and related medical conditions], disability,

	leave, age, citizenship status, genetic information, ancestry, breastfeeding, marital status, gender identity, gender expression, sexual orientation, medical condition including AIDS/HIV, political activities and affiliations, military and veteran status, and status as a victim of domestic violence, assault, or stalking).
Business or commercial purposes for collection of this data	Solely as strictly necessary for the purposes described in Section 1 above regarding employee data and as otherwise required in connection with managing the employment relationship (e.g., sick leave, sick pay, accidents at work, other employment-related claims, accommodating disability within the workplace, maternity leave, etc.). Solely to the extent required to comply with the firm's legal or other best practice obligations (e.g., Anti-Money Laundering ("AML"), equality laws, monitoring diversity and inclusion, etc.).
Personal information has been collected from these categories	See Section 1 above
Personal information has been shared with these third parties	<ul style="list-style-type: none"> • RiverFront Investment Group Affiliates • Suppliers and service providers where necessary to perform functions on our behalf. • Mandatory disclosures and legal claims (e.g., to comply with any subpoena, court order, or other legal process; or to comply with any regulatory, governmental or other legally binding request).
Section 4	
Category of Personal Information	Commercial information, including records of personal property, products or services purchased, invested in, obtained, or considered, or other purchasing or consuming histories or tendencies.
Business or commercial purposes for collection of this data	See Section 1 above
Personal information has been collected from these categories	See Section 1 above
Personal information has been shared with these third parties	See Section 1 above
Section 5	
Category of Personal Information	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.
Business or commercial purposes for collection of this data	To make our website more intuitive and easy to use. To protect the security and effective functioning of our website. To communicated with advisors and investors at their request based on form submissions.
Personal information has been collected from these categories	Via the Firm's website.
Personal information has been shared with these third parties	RiverFront Investment Group Affiliates RiverFront's service providers to the extent necessary for the provision of IT services on our behalf.
Section 6	
Category of Personal Information	Audio, electronic, visual, thermal, olfactory, or similar information.
Business or commercial purposes for collection of this data	Audio/visual - where required for legal/regulatory and security reasons, to keep a record of client instructions or other matters discussed. For purpose of transcribing or preparing a written note of client interviews (recording deleted once transcript or note completed).

Personal information has been collected from these categories	Conference calls and video conferences with clients and other third parties. Interviews with clients as part of client feedback program. Videos from security cameras in office.
Personal information has been shared with these third parties	RiverFront Investment Group Affiliates. To our service providers to the extent necessary for the provision of IT services on our behalf. Mandatory disclosures and legal claims (e.g. to comply with any subpoena, court order or other legal process or to comply with any regulatory, governmental or other legally binding request).
Section 7	
Category of Personal Information	Professional or employment-related information.
Business or commercial purposes for collection of this data	See Section 1 above in relation to employees and job applicants.
Personal information has been collected from these categories	See Section 1 above in relation to employees and job applicants.
Personal information has been shared with these third parties	See Section 1 above in relation to employees and job applicants.
Section 8	
Category of Personal Information	Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).
Business or commercial purposes for collection of this data	See Section 1 above in relation to employees and job applicants.
Personal information has been collected from these categories	See Section 1 above in relation to employees and job applicants.
Personal information has been shared with these third parties	See Section 1 above in relation to employees and job applicants.

8.3 – Disclosures of Personal Information, No Sale

Over the preceding 12 months, we disclosed certain categories of California residents’ personal information to the categories of third parties as shown in the table above. We do not and will not sell California residents’ personal information.

8.4 – California “Do Not Track” Disclosure

At this time, RIG does not alter the practices detailed herein based upon your selection of the “Do Not Track” setting or other “opt out” setting or feature that may be offered by your browser.

9. CHILDREN

Our Services are not designed for individuals under the age of 16. We do not knowingly collect or store any personal information from children under the age of 16. If we become aware that we have collected personal information from a user under age 16, we will remove his or her personal information from our files. If you are a parent or guardian and believe RIG may have inadvertently collected personal information from your child, please notify us immediately by sending an email to WebsitePrivacy@riverfrontig.com.

10. RETENTION

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); and
- Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation, or regulatory investigations).

11. CHANGES TO THIS PRIVACY STATEMENT

The Privacy Statement may be revised from time to time. We display an effective date at the end of this Privacy Statement (“Last Revised Date”) for you to know when there has been a change. Accordingly, you should check the Privacy Statement on a regular basis for the most current privacy practices. Each time you access, use or browse the Website, you signify your acceptance of the then current changes to the Privacy Statement. Any changes in the Privacy Statement will take effect upon posting.

12. CONTACT US

If you have questions or concerns regarding our privacy policy or practices, would like to request that your information be deleted, or need to correct any of your personal information, you may contact us via email at WebsitePrivacy@riverfrontig.com or by phone: 866-583-0744.

Last Revised Date: February 14, 2023