

Matson Money, Inc., Matrix Asset Allocation Division

PRIVACY NOTICE

How Matrix Asset Allocation (“Matrix”) protects Account Owners’ (“Account Owner”) personal information:

Matrix, a division of Matson Money Inc., takes precautions—including administrative, technical, and physical measures—to safeguard personal information against loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction. We restrict access to Account Owners’ personally identifiable financial information (“Nonpublic Personal Information”) to employees who need to know that information in order to provide services to Account Owner. Matrix also maintains physical, electronic, and procedural safeguards to protect Account Owners’ non public personal information.

Integrity of Account Owners’ personal information:

Matrix has safeguards in place to keep Account Owners’ information complete and up to date. Matrix has a proprietary software that provides the tools to review and update Account Owner information. No other software used at Matrix can affect the Account Owner’s account information. This software logs every change made to an account so that it has a paper trail for tracking and accountability. Only a select group of people have the ability to alter Account Owners’ data. Website access is strictly read-only; no changes can be made via the website.

Technologies:

The Matrix website that Account Owners may access, <http://www.mymatrix.cc>, is a forced SSL site (meaning all traffic is encrypted) that does not allow saving of login information. Matrix requests the username and password upon each login. Matrix maintains an integral difference between what is contained in the database and what Account Owner and Authorized Representatives can access. Full database backups are performed every night. These backups are rotated on an abbreviated GFS scheme; translating into 6 tapes for daily backups, 2 tapes for weekly backups, and 1 tape for monthly backup. This is an industry standard approach modified for limited archival retrieve based on our constantly changing data. Backups are encrypted on both disk and tape using 168-bit encryption.

Company-wide commitment to privacy of Account Owners:

Matrix does not sell Account Owners’ personal information to anyone. Matrix collects Nonpublic Personal Information from Account Owners from the following sources:

- Account applications and other forms, which may include an Account Owner’s name, address, social security number, and information about the Account Owner’s investment goals and risk tolerance.
- An Account Owner’s professional advisors, such as an Account Owner’s broker, financial planner, attorney, or accountant (an “Authorized Representative”), who may provide financial or investment history and tax information about the Account Owner.
- History of account(s), including information about the transactions Matrix has ordered for Account Owner and balances in Account Owner’s account(s).
- Correspondence, written or telephonic, between Account Owner and Matrix or Account Owner’s Authorized Representative, or custodian and Matrix.

Matrix does not disclose any Nonpublic Personal Information about Account Owner to any entity that is not an affiliate of, or related by common ownership or affiliated by corporate control (“Unaffiliated Third Party”) with, Matrix except as permitted or required by law. Accordingly, Matrix may disclose all of the information Matrix collects about the Account Owner or the Account Owner’s account(s), as described above, under the following circumstances:

- Matrix receives an Account Owner’s prior consent.
- Matrix believes the recipient to be an Account Owner’s Authorized Representative.
- The recipient is an Authorized Representative, custodian, or other service provider with whom we must share information in order to manage or service an Account Owner’s account properly.
- The recipient is an Unaffiliated Third Party that performs marketing services on Matrix’s behalf, and
- Matrix is required by law to release the information to the recipient.

Matrix will only use information about Account Owner and Account Owner’s account(s) to:

- To service Account Owner’s investment and financial needs.
- Manage and service Account Owner’s account(s).
- Administer Matrix’s business.

Matrix will adhere to the policies and practices described in this policy whether Account Owner is a current or non-current Account Owner of Matrix.

Matrix will not directly contact Account Owner to ask for Nonpublic Personal Information for Account(s).

- Any request or verification of Nonpublic Personal Information will be directed to an Authorized Representative.
- If Nonpublic Personal Information is requested by someone other than an Authorized Representative, Matrix will verify social security number and date of birth of Account Owner prior to release of said information. This type of request would occur in the event Account Owner closes account(s) and assets are being transferred to a new investment firm.