



Digital Privacy Policy

Who we are

ETF Model Solutions, LLC (“ETFMS”, “we”, “us” and/or “our”) offers investment advisory and investment management services primarily through ETF-based asset-allocation strategies and model portfolios, financial planning and investment advisory services (“Services”). ETFMS is a U.S. Securities & Exchange Commission Registered Investment Adviser based in Appleton, WI. We make information available about our services through our website(s), including, but not limited to www.ETFModelSolutions.com, <https://embark-invest.com/>, mobile applications and corporate pages on social media sites, including, but not limited to LinkedIn, Twitter, and Facebook (individually, the “Website”, and collectively, the “Websites” and our related mobile app (“App”). *Note: Registration does not imply any particular skill or training.*

Our website(s) use cookies

We use cookies to analyze our website traffic (e.g., which pages you visit, what type of device you use, which geographic location you're located in, etc.). We also share information about your use of our site with our analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services. To view our site, you need to provide us with permission to do so by checking the “I accept to the use of cookies” box. If you do not provide us with permission, you may be unable to view certain content on our site.

Cookies are small text files that can be used by websites to make a user's experience more efficient. We do not use cookies to collect personally identifiable information (without your express permission).

The Website(s) uses different types of cookies. Some cookies are placed by third party services that appear on our pages. Once you've accepted cookies on this website, you will no longer be presented with the settings popup again, unless:

- You access this website using a different computer
- You access this website using a different web browser



Turning Cookies Off

You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies. Doing so, however, will likely limit the functionality of our and a large proportion of the world's websites as cookies are a standard part of most modern websites.

What personal data we collect and why we collect it

ETF Model Solutions, LLC uses content forms on the Websites which it controls to collect data from persons that voluntarily provide it when they sign up to receive newsletters, white papers, research reports or other content, subscribe to our blog, request a portfolio review, or risk profile analysis, or otherwise indicate that they are interested in learning more about our services. Content submitted via these forms is maintained indefinitely until individual opts out of receipt of newsletters or other marketing collateral that may be sent from time to time.

You may decline to provide personal information to ETFMS. Declining to provide personal information may disqualify you from receiving ETFMS services and access to content and Site features that require certain personal information.

Use of information

The personal information we collect will be used for the following purposes:

- Business purposes – Personal information you voluntarily submit while using the website by signing up to receive newsletters, requesting a portfolio review or risk profile analysis will be used for the purposes of communication with you and conducting business relevant to your request.
- Marketing purposes – Information collected about your activity while on our website (such as the pages you visit and actions you take) will be used to better understand how users interact with our website.

Information voluntarily submitted through forms may be stored in multiple places, including:

- The email accounts for the recipient(s) of form submissions
- The website database for ETF Model Solutions, LLC

Information about your website activity may be collected by 3rd-party services, including:

- Anonymous activity data collected by analytics services (Google Analytics)
- Personal activity data collected by analytics services (Facebook Pixel) ETFMS does not utilize user data for automated decision making or user profiling.

ETF Model Solutions, LLC

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Phone: 920-785-6010 • Fax: 920-227-0521

privacy.etfms@endowmentwm.com



Embedded content from other websites

Articles on the Website(s) may include embedded content (e.g., videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

This Privacy Policy and these terms apply only to ETFMS operated services and applications. ETFMS does not control linked Third-Party websites or their privacy practices, which may differ from those set out in this Privacy Policy. ETFMS does not endorse or make any representations about linked Third-Party websites. Any Personal Information you choose to give to linked third parties is not covered by this Digital Privacy Policy. We encourage you to review the privacy policy of any company or website before submitting your Personal Information. Some third parties may choose to share their users' Personal Information with us; that sharing is governed by that company's privacy policy, not this Privacy Policy.

Who we share your data with

ETFMS does not share personal data with any unaffiliated third party. If you become a client of our ETFMS or one of our affiliates, we will share your data with third-party service providers that provide us with necessary services to help us serve your account. We do not share mobile information with third parties or affiliates for marketing or promotional purposes without your permission. Text messaging opt-in data and consent will remain strictly confidential and will not be shared with any third parties.

See our [Privacy Notice](#) for More Information.

How long we retain your data

We will store your usage data until such time when you withdraw your consent for us to do so. All other data as specified above will be retained for as long as is necessary for the purpose(s) for which we originally collected it. We may also retain information as required by law.

How we protect your data

ETFMS takes reasonable steps and seeks to use appropriate technical or organizational measures to protect your Personal Information from loss, misuse, and unauthorized access, alteration, disclosure, or destruction. We proactively monitor our stored data using intrusion detection and employ other industry standard security practices. However, no Internet,

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email, or electronic operating system that enables the transmission of data is ever fully secure or error free therefore, we cannot ensure or warrant the security of any information you transmit to us.

What rights you have over your data

If you provide us with personal information, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also:

- Request rectification of your personal data
- Request the erasure of your personal data
- Request the restriction of processing your personal data

To request any of the above, please send an email to Privacy.ETFMS@ETFModelSolutions.com with “Personal Information Request” form in the subject line and include your requested action in the body of the message

This does not include any data we are obliged to keep for administrative, legal, or security purposes.

How do I request a copy of my personal information?

Under the GDPR, EU residents have the right to place a SAR (Subject Access Request) to see what personal data an organization holds about them. Please send an email to Privacy.ETFMS@ETFModelSolutions.com with “Personal Information Request” form in the subject line and include your request in the body of the message.

Special Note to International Users.

The Websites are hosted in the United States and is intended for and directed to Users in the U.S. If you are a User accessing the Websites from the European Union, Asia, or another jurisdiction with laws or regulations governing personal data collection, use, and disclosure, that differ from United States, please be advised that through your continued use of the Websites, which is governed by U.S. law, this Privacy Policy, and our Terms of Service, you are transferring your Personal Information to the United States and you consent to that transfer.