



## **INTRODUCTION**

1834 Investment Advisors Co. (“1834 Investment Advisors,” “we,” “our,” or “us”) respects the privacy of your information. This Privacy Policy is designed to assist you in understanding how we collect, use and safeguard the information you provide to us in using our website (the “Site”), and the services provided through our Site (the “Services”).

If you have a consumer financial product or service with us, we will use and share any information that we collect from or about you in accordance with our [U.S. Consumer Privacy Notice](#) which offers you certain choices with respect to the use and sharing of your personal information.

From time to time, we may change this Privacy Policy. If we do, we will post an amended version on this webpage. Please review this Privacy Policy periodically.

## **COLLECTING AND USING INFORMATION**

### **Personally Identifiable Information We Collect Online**

We may collect Personally Identifiable Information from you through your use of the Site and Services. “Personally Identifiable Information” is individually identifiable information about an individual consumer that we collect online and that we maintain in an accessible form. We collect the following types of Personally Identifiable Information:

#### *Information You Provide*

We may collect Personally Identifiable Information that you voluntarily provide to us, including, but not limited to, your first and last name, email address, and telephone.

#### *Information as You Navigate Our Site*

We automatically collect certain Personally Identifiable Information through your use of the Site and Services, such as the following:

- *Usage Information.* We collect information such as which of the pages on the Site you access, the frequency of access, and what you click on while on the Site.
- *Device Information.* We collect information about the device you are using, such as hardware model, operating system, application version number, and browser.
- *Mobile Device Information.* In addition to the Device Information listed above, when you access our Site via a browser on your mobile device, we collect and aggregate information about whether you are accessing the Site via a mobile device or tablet, device type, and carrier.
- *Location Information.* We collect location information from Site visitors on a city-regional basis.

#### *Third-Party Information*

In some cases, we may receive certain Personally Identifiable Information from you about a third party. For example, if you complete the Contact Us form on the Site on someone else’s behalf, you may provide the name, email address, and personal phone number of a third party. If you submit any Personally Identifiable Information about another individual to us, you are responsible for making sure that you have the authority to do so and to allow us to use their Personally Identifiable Information in accordance with this Privacy Policy.

## **How We Use Your Personally Identifiable Information**

We use the Personally Identifiable Information we collect to provide the Services to you, to improve our Site and Services, and to protect our legal rights. In addition, we may use the Personally Identifiable Information we collect to:

- Service client online accounts;
- Contact you regarding our products and services that we feel may be of interest to you;
- Communicate with you about our Site or Services or to inform you of any changes to our Site or Services;
- Provide support;
- Maintain and improve our Site and Services;
- Defend our legal rights and the rights of others;
- Efficiently maintain our business; and
- Comply with applicable law.

## **How We Share Your Personally Identifiable Information**

We may share the information that we collect about you in the following ways:

- With service providers who perform data and Site-related services on our behalf (e.g., email, hosting, maintenance, backup, analysis, etc.). Any such service providers will be under an obligation to us to maintain the confidentiality of your Personally Identifiable Information;
- With companies, business partners or persons that provide services in connection with your investments and other transactions to the extent necessary or appropriate in order to carry out the investment advisory services;
- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention;
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that Personally Identifiable Information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personally Identifiable Information;
- To any other person or entity as part of any business or asset sale; and
- To any other person or entity where you consent to the disclosure.

## **COOKIES AND OTHER TRACKING TECHNOLOGIES**

### **How We Use Cookies**

Like many other companies, we use cookies and other tracking technologies (such as pixels and web beacons) (collectively, “Cookies”). “Cookies” are small files of information that are stored by your web browser software on your computer hard drive, mobile or other devices (e.g., smartphones or tablets).

We use Cookies to:

- Estimate audience size and usage patterns;
- Keep track of search engine results;
- Compile aggregate data about site traffic and site interactions to resolve issues and offer better site experiences and tools in the future; and
- Recognize when you return to the Site.

We set some Cookies ourselves and others are set by service providers. We use Cookies set by service providers to provide us with useful information to help us improve our Site and Services.

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## How You Can Opt-Out of Cookies

### *Browser Settings*

Cookies can be blocked by changing your Internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including essential Cookies) you may not be able to access all or parts of the Site.

You can find out more about Cookies and how to manage them by visiting <http://www.allaboutcookies.org/privacy-concerns/>.

### *Advertising Industry Resources*

You can understand which entities have currently enabled Cookies for your browser or mobile device and how to opt-out of some of those Cookies by accessing the Network Advertising Initiative's website or the Digital Advertising Alliance's website. For more information on mobile specific opt-out choices, visit the Network Advertising Initiative's Mobile Choices website.

Please note that these opt-out mechanisms are specific to the device or browser on which they are exercised. Therefore, you will need to opt out on every browser and device that you use.

## THIRD-PARTY PROCESSORS

To ensure that your Personally Identifiable Information receives an adequate level of protection, we have put in place appropriate procedures with the service providers we share it with to ensure that it is treated consistent with applicable data security and privacy laws. For example, we use service providers to deliver our wealth management services, including, for example, online client accounts and financial dashboards.

## GOOGLE ANALYTICS

We use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses Cookies or other tracking technologies to help us analyze how users interact with the Site and Services, compile reports on their activity, and provide other services related to their activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The technologies used by Google Analytics do not gather information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to [Google's privacy policies](#). To learn more about Google's partner services and to learn how to opt-out of tracking of analytics by Google, [click here](#).

## "DO NOT TRACK" SIGNALS

Some internet browsers incorporate a "Do Not Track" feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the "Do Not Track" signal, the Site does not currently interpret, respond to or alter its practices when it receives "Do Not Track" signals.

## SECURITY

We maintain commercially reasonable security measures to protect the Personally Identifiable Information we collect and store from loss, misuse, destruction, or unauthorized access. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your Personally Identifiable Information, we cannot guarantee absolute security.

## THIRD-PARTY LINKS

The Site and Services may contain links that will let you leave the Site and Services and access another website. Linked websites are not under our control. This Privacy Policy applies solely to Personally Identifiable Information that is acquired on this Site. We accept no responsibility or liability for these other websites.

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## **CHILDREN'S PRIVACY**

The Site and Services are not intended for children under 13 years of age. We do not knowingly collect, use, or disclose personal information from children under 13.

## **HOW TO CONTACT US**

To contact us for questions or concerns about our privacy policies or practices please call 414-615-1012.