

# Privacy Policy

Last updated: June 27, 2017

This privacy policy (this "Privacy Policy") explains how personal information is collected, used, stored, and disclosed by Invest Forward, Inc. ("Grand," "we," "us," and "our"). This Privacy Policy applies to consumer users (individually referred to as "you") of our websites, applications, and other online services to which this Privacy Policy is posted (collectively, our "Services").

This Privacy Policy (together with Terms of Use and Advisory Agreement) make up the Grand Legal Docs. By accessing or using our Services, you agree to the Grand Legal Docs. The provisions contained in this Privacy Policy supersede all previous notices and statements regarding our privacy practices with respect to our Services. If you do not agree to every provision of the Grand Legal Docs, you may not access or use our Services.

## APPLICATION OF THIS PRIVACY POLICY

This Privacy Policy applies to your use of (regardless of means of access) our Services. You may access or use our Services through a desktop, laptop, mobile phone, tablet, or other consumer electronic device (each, a "Device").

## INFORMATION WE COLLECT

For Visitors to our Site. When you visit our site we collect various types of anonymous information, such as such as browser type, IP address, date and time of access, cookie ID, and referrer URL. Along with cookies, Grand may also use third-party tracking technology, such as Google Analytics, to record similar information regarding you and your activity on the Site. This information is used to understand our users and provide a better user experience. You can always choose to prevent Google Analytics from recognizing you on future visits to our site by disabling cookies on your browser or installing the Google Analytics Opt-Out Browser Add-On.

For Clients. If you choose to become a client, in addition to the above, we will collect certain information, including, but not limited to, your full legal name, contact information, birth date, Social Security Number, citizenship, investment objectives, approximate net worth, and other regulatory disclosures that may be necessary and required under Federal and statutory law.

## USE OF INFORMATION

Grand stores, processes, and maintains data related to you in order to provide client support, offer new products or services and provide our service to clients in accordance with the rules of the Securities and Exchange Commission. Access to your personal and financial information is limited to only those employees with authorized access. You may choose not to provide such information to us, but if you choose not to provide such information, you will not be able to become a client.

We may share the information required to become a client with our partners, solely for the purpose of allowing our partners to provide services to you. Our partners and any other third parties who assist us in providing our service to you must agree to keep your personal information confidential.

Grand may use your Personal Data to communicate with you regarding the management of your account or to tell you about new services that we believe will be of interest to you. If you decide at any time that you no longer wish to receive certain communications from us you can always unsubscribe here. Please note that you cannot opt-out of administrative communications such as regulatory, billing or service notifications.

## INFORMATION SHARING

We do not share your Personal Information with: (1) other financial companies for joint marketing purposes; (2) affiliated companies for their everyday business purposes; or (3) any third parties so they can market to you.

We may share your Personal Information with unaffiliated third parties: (1) if you request or authorize it; (2) if the information is provided to help complete a transaction for you; (3) if the information is provided to: (a) comply with applicable laws, rules, regulations, governmental and quasi-governmental requests, court orders, or subpoenas; (b) enforce our Terms of Use or other agreements; or (c) protect our rights, property, or safety or the rights, property, or safety of our users or others (e.g., to a consumer reporting agency for fraud protection, etc.); (4) if the disclosure is done as part of a purchase, transfer, or sale of services or assets (e.g., in the event that substantially all of our assets are acquired by another party, your Personal Information may be one of the transferred assets); (5) if the information is provided to our third-party service providers to perform functions on our behalf (e.g., analyzing data, providing marketing assistance, providing customer service, processing orders, etc.); (6) with regard to all contest, sweepstakes and other promotion prize announcements, advertisements and legally required winners lists; (7) for our everyday business purposes; or (8) as permitted by applicable law or otherwise described in this Privacy Policy. When you are no longer our customer, we continue to share your information as described in this Privacy Policy.

We may disclose Analytics with third parties as described elsewhere in this Privacy Policy and for our commercial purposes.

## SECURITY

The security of your personal information is important to us. When you enter sensitive information, such as a credit card number or financial information, on our forms, we encrypt the transmission of that information using secure socket layer technology (SSL).

We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Web site, please contact us.

## CHANGES TO THIS POLICY

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will notify you by email or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## CONTACT US

If you have any questions regarding this Privacy Policy, or if you wish to ask us to delete, correct, or show you your Personal Information as provided above, please contact us at [support@grand.co](mailto:support@grand.co), or Invest Forward, Inc., 370 Lexington Ave, Suite #1704, New York, NY 10017.