



Caravel Concepts, LLC Privacy Policy

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1. Overview

Caravel Concepts LLC (“Caravel” or “the Company”) is committed to maintaining robust privacy protections. Our Privacy Policy (the “Privacy Policy”) is designed to help you understand our privacy practices, how we collect, use and safeguard the information you provide to us, and to illustrate our commitment to respect the privacy of financial information and the security of consumer personal information.

2. Authorization of Use

Caravel offers public websites and access restricted websites, financial planning software, portfolio construction tools, and other Software as a Service products and services (the “Services”). You, any co-client who participates with you in your planning process (collectively, “you” or “your”), along with your financial advisor, associates working with your financial advisor, or the firm where your advisor is licensed (collectively, your “Advisor”) input your personal information and, if applicable, your co-client’s personal information, into Caravel’s Services. When accessing Caravel Services, you and your Advisor agree to abide by the terms of this Privacy Policy. Your Advisor has access to the Services as you have permitted in your separate agreements with them. Advisor use of your personal information is governed by the Advisor’s privacy policy(ies). Please contact your financial advisor if you have questions about their firm’s privacy policy.

3. Collection of Personal Information

In order to provide our Services, Caravel may collect some or all of the following types of personal information:

- Identifiers like postal address, email address, account name, unique personal identifier, login credentials, or other similar identifiers;
- Customer records like address, telephone number, employment, bank and other financial account numbers, or any other financial information that may be required to provide our Services;
- Personal characteristics like age, marital status, and sex;
- Income and savings data such as current income, current and anticipated savings rates, rental income, Full Retirement Age Social Security benefits, and other income and savings data required to offer Caravel Services;
- Your total assets including investment account assets with account balances, positions and history, real estate assets, mortgages and other liabilities, expected inheritance, and other assets necessary to provide Caravel Services;

- A comprehensive view of your financial goals, including potential retirement expenses, expected medical costs, lifestyle choices, education expenses, and other hoped for future expenditures;
- Internet or other similar network activity, like online identifier, Internet Protocol address, web browser, cookie identifiers and other identifiers that are automatically assigned to your computer or devices when you access the Internet and interact with our Services;

Caravel may receive the personal information outlined above from you, your Advisor, integration partners, and government entities.

“Personal information” does not include de-identified or aggregated consumer information.

4. Use of Personal Information

Caravel does not sell, rent or lease consumer personal information we collect. Caravel does not have access or authority to transact on your behalf or to make any changes in your investment, mutual fund, banking, or any other of your financial accounts (your “Accounts”) for which we may collect information. In compliance with federal and state laws, we may use consumer personal information for one or more of the following business purposes:

- To help you and your Advisor develop a financial plan for your future and an asset allocation strategy customized for the requirements of your financial plan.
- To keep your financial plan updated and current. For example, account information is collected through integration partners in order to automatically update your financial plan for market movements and any transitions you and/or your Advisor have implemented in your accounts;
- To create, maintain, and secure your Caravel financial plan information;
- To communicate with you and/or your Advisor
- To provide measurement, analytics and other business services;
- To keep you and your Advisor updated with respect to changes in your plan results;
- To help maintain the safety, security, and integrity of our Services, databases, other technology assets and business lines;
- For testing, debugging, and product development to develop and improve our Services;
- To evaluate or conduct a merger, dissolution or other sale or transfer of some or all of Caravel’s assets, where Caravel’s existing client base is one of the assets in question;
- To respond to law enforcement requests and as required by applicable law, court order or governmental regulations;
- As described to you when collecting your personal information; and
- For the reasons otherwise set forth in this Privacy Policy.

Aggregated or de-identified consumer information is not personal information, and Caravel may use aggregated or de-identified consumer information as it sees fit for appropriate business purposes.

5. Cookies and Similar Technologies

In an effort to improve our services, we, as well as third parties that provide content or other functionality to the Services, track the information provided to us by your browser, our Services, and other interfaces between our Services and the device you use to access those Services. Information tracked includes the website you came from, the type of browser you use, the device from which you accessed our Services, the date and time you accessed our Services, the pages you visited, and other information that does not personally identify you. We track this information using cookies, pixel tags, local storage, and other technologies (“Cookies”) to collect tracking and identification information. Cookies are essentially small data files placed on your device(s) that allow us to record how visitors use the Services and to improve software function and site navigation. The use of Cookies is described in our Cookie Policy below.

6. Disclosing Personal Information to Others

We do not sell your personal information and we do not sell the personal information of former Caravel clients to third parties.

We may disclose personal information to nonaffiliated businesses for a business purpose. We disclose personal information for a business purpose to the following categories of third parties:

- Companies that perform services for us or on your behalf, including third-party vendors and service providers that provide services to us for a variety of business purposes, such as data security, maintaining your Financial Plan, data hosting, auditing, and data processing;
- Financial services companies, data aggregation services, and your Advisor;
- Companies participating with Caravel in a proposed or actual sale, merger, transfer, or business exchange.
- Non-affiliated parties as allowed by law, such as in responding to a subpoena, preventing fraud, or complying with an inquiry by a government agency or regulator; and
- Other organizations as directed by you or your Advisor.

7. Retaining Personal Information

Caravel complies with financial laws and regulations to maintain records for statutorily required periods of time. Retaining personal information is often necessary for us and our service provider(s) to:

- Show historical progress toward meeting financial goals on financial plans, or other analytical and reporting features that may enhance our Services;
- Offer the ability to reconstruct financial plan results across time.

- Comply with legal or regulatory obligations;
- Debug products and improve overall Services functionality;
- Other internal and lawful uses of that information that are compatible with the context in which the information was provided.

8. Protecting Personal Information

We implement security measures designed to protect your information from unauthorized access. Personal information resides exclusively on Services with restricted access and multi-factor authentication processes. We further protect your information using technological security measures including data encryption and transport layer security technology. Caravel devotes significant resources to ensuring that your information is secure from unauthorized access. However, these measures do not guarantee that your information will not be accessed, disclosed, altered, or destroyed by breach of these security measures.

9. Notification of Changes

By using the Services, you consent to the collection and use of the personal information described above. Caravel reviews the Privacy Policy annually and reserves the right to amend the Privacy Policy at our discretion and at any time. Privacy Policy updates will be posted on this page with an updated effective date. Your continued use of the Services following the new effective date constitutes your consent to and acceptance of such changes.

10. Your Rights and Choices

You may be entitled, in accordance with applicable law, to request a review, deletion, and electronic transfer of your information. We will ask that you work with your Advisor in the removal of your information from the Services. Some functions and features may not be available once some or all of your information is deleted or moved out of the Services. Any such request to alter information on the Services is subject to appropriate confirmation of your identity or, in the case of third party requests, their authority to request such an alteration of your information.

11. Caravel Cookie Policy

We, as well as third parties that provide content or other functionality to the Services, may use cookies, pixel tags, and other technologies to collect information. The information collected helps improve our software, improve site navigation and organization, and personalize the Services.

- **Cookies.** Cookies are small files placed in your computer browser. Cookies provide information that is used for security purposes, to improve navigation, display information more effectively, and to customize your online experience. Most browsers allow you to block or delete cookies. If you choose to delete cookies, our Services may not work properly.

- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a technology that may be placed on certain pages of our website, emails, and other aspects of our Services. These technologies work in conjunction with cookies and allow us to measure the effectiveness of our site and compile statistics about usage.
- **Social Media Widgets.** Caravel Services may allow you to share some aspects of our content on social media platforms such as Twitter and LinkedIn widgets. When you share content on social media, these widgets may collect your IP address, which page you are visiting from the Services, and may set a cookie to enable the feature to function properly. These features are governed by the privacy policy of the social media company providing them and you assume the risk that third parties may use the information you provide.
- **Google Analytics.** We may use Google Analytics and other vendors to better understand visitor demographics on some of our services and to develop Services content. You can opt out of Google’s collection and processing of the data your use of the services generates. The privacy policies and practices of Google and other third-party providers will govern their use and collection of this information.

12. Opting Out of Cookies, Pixel Tags, and other Technologies

By using the Services, you consent to our use of cookies and other information gathering technologies. However, if you would like to opt-out of these technologies, you may block, delete, or disable them through your browser, as applicable:

- Some browsers have options that allow the visitor to control whether and how cookies are used, and allow users to delete any cookies that have been stored on their device. Each web browser is different and you should consult the instructions provided by your web browser to alter its cookie settings.
- Some devices may also have controls that allow you to make choices about cookies, pixel tags, and other technologies, although cookie-based opt-outs may not be effective on mobile applications.

If you choose to refuse, disable, or delete cookies and other such technologies, some of the functionality of the Services may no longer be available to you.

13. Version History

Effective Date	January 1, 2023
Version	1.0
Owner / Approval	Sarah R. Tobey

14. Revision History

Versions	Date	Revision Description
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