

# Index Funds Advisors, Inc.'s Privacy Policy

At Index Funds Advisors, Inc. (IFA), you are our most important asset. We understand that you have entrusted us with your private financial information, and we do everything we can to maintain that trust. Details of our approach to privacy and how your personal information is collected and used are set forth in the IFA Privacy Policy on the following pages.

## **The IFA Privacy Policy**

Throughout this privacy policy we refer to information that personally identifies you or your accounts as "personal information." This privacy policy applies to investors who are current or former IFA clients and to people that take IFA's Risk Capacity Survey which is found on its Website, ifa.com, and linked to from IFA's other Websites.

### **1. IFA does not share Client personal information with third parties unless one of the following limited exceptions applies.**

- To provide the service that a client has requested or authorized, or to maintain and service the client's account.
- To comply with regulatory requirements or law enforcement officials who have jurisdiction over the Index Funds Advisors, or as otherwise required by any applicable law.
- To the extent reasonably necessary to prevent fraud and unauthorized transactions.
- We disclose personal information to companies that help us process or service your transactions or account(s), including companies that print and mail your account statements.

Visitors to Index Funds Advisors' Websites that take the risk capacity survey and provide correct personal information and request the results can do so only after being notified that they may be called by an IFA Investment Advisor Representative to analyze their survey results.

### **Outside of these exceptions, we will not share personal information with third parties.**

### **2. We do collect personal information in the normal course of business in order to administer your accounts and serve you better.**

- Application and registration information. We collect information that you provide to us when you open an account or register for one of our services, such as seminars, or when you accept a promotional offer for an IFA sponsored product or service. The information we collect may include name, address, phone number, email address, Social Security number, and information about your interests, investments, and investment experience. We also may collect information from consumer reporting agencies.
- Transaction information. Once you have an account with us, to administer your account and better serve you, we collect and maintain personal information about your transactions, including balances, positions, and history, and may include your name or other data in an internal client list that reflects your activities at IFA.
- As part of our efforts to reach and serve new and existing clients we sometimes collect information from outside mailing lists.

### **3. We use your personal information to fulfill our regulatory obligations and to help us deliver the best possible service to you.**

- For example, we may use your personal information to provide faster, more convenient services or to alert you to IFA products and services you may find useful.

### **4. We protect the confidentiality and security of your personal information.**

- Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are required to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific services we have requested.

- We restrict access to personal information to our employees and agents for business purposes only. All employees are trained and required to safeguard such information.

**5. We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.**

- If you identify any inaccuracy in your personal information, or you need to make a change to that information, please contact us so that we may promptly update our records. You may write to us at:

Index Funds Advisors  
19200 Von Karman Avenue, Suite 150  
Irvine, CA 92612

Or call 888-643-3133

**6. We will provide notice of changes in our information-sharing practices.**

- If at any time in the future it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advanced notice of the proposed change so that you will have the opportunity to opt out of such disclosure.

**7. Internet safeguards.**

- IFA uses a variety of protective elements that are used commonly by companies doing business over the Internet, including the use of firewall barriers, special software and password protected areas on its Websites. The custodian/brokers used by IFA make use of similar protective elements and additionally utilize encryption technology and authentication procedures.

**8. E-mail communications.**

- E-mail is an important form of communication between IFA and Clients. IFA also uses e-mail to communicate with prospective Clients. IFA may communicate information in e-mails that relate to subjects that IFA knows are important to you, including regulatory information. For example, such communications may relate to periodic offers of how you can receive various disclosure documents of IFA's.

- Opt out – IFA may also use your e-mail address to send you information about services and products we believe may be of interest to you. If you prefer not to receive these by e-mail, please send us an e-mail or call us at 888-643-3133.

**9. Corrections to personal information.**

IFA offers several options for accessing and, if necessary, correcting your account information. You can review brokerage statements provided by your designated custodian/broker, you can review the quarterly reports provided by IFA, or you may e-mail, write or call us to request information. If we serve you through an IFA Solicitor, you may also contact them directly.

The accuracy of your personal information is important to us. If you have a concern about your personal information, or want to correct, update, or confirm your information, please write to us at:

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