



FACTS	What does Vestwell do with your personal information?
Why?	Financial companies choose how they share your information. Federal law gives consumers the right to limit some, but not all, sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you receive from us. This information includes your full legal name, address, date of birth, Social Security Number or other personal identification number, account balance, and transaction history. When you are no longer our customer, we continue to retain and share your information as described in this notice below.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information, the reasons Vestwell shares your information, and whether you can limit this sharing.

Reasons we share your Personal Information	Does Vestwell share?	Can you limit this sharing?
For our everyday business purposes such as to process a request to open an account in your name, respond to court orders and similar requests, or report to credit bureaus	Yes	No
For our own marketing purposes to offer our products and services to you	No	No
For joint marketing with other financial companies to offer products to you	Yes	Yes

For our affiliates' everyday business purposes - Information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes - Information about your creditworthiness	No	No
For troubleshooting and related technical assistance	No	No
For nonaffiliates to market to you	No	No

Who are we?	
Who is providing this notice?	Vestwell Holdings Inc. and our subsidiaries Vestwell Trust Company, LLC and Vestwell Advisors, LLC
What we do	
How does Vestwell protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards, network access controls, and secured files and physical facilities. Our employees undergo background checks, refresher background checks, and complete mandatory security training about our privacy policies on an annual basis. We also use multi-factor authentication to validate our employees' and participants' identities.
How does Vestwell collect my personal information?	We collect your personal information when you open an account with us; make a deposit, withdrawal, or transfer; or when you or your employer provide information to us about you.
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> ● Sharing for affiliates' everyday business purposes regarding information about your creditworthiness ● Our affiliates from using your information to market to you ● Sharing for nonaffiliates to market to you <p>You should be aware that Vestwell does not collect or share information for those purposes. State laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ● Vestwell, LLC ● Vestwell Advisors, LLC ● Vestwell Administrative Services, LLC ● Vestwell State Savings, LLC ● Vestwell Trust Company, LLC
Nonaffiliates	<p>Vestwell shares information with a limited group of vetted service providers, identity verification services, and banking partners in order to execute your investment and enrollment directions and process your transaction requests.</p>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Vestwell engages in joint marketing activities with some of our business partners with which we conduct webinars and other in-person and virtual events. Our joint marketing partners include banking partners, payroll companies, our student loan management services partner, Spinwheel Solutions Inc., and various financial services organizations.¹</p>
Questions?	<p>Contact us at (917) 979-5359 or help@vestwell.com or go to www.vestwell.com</p>

¹ Vermont: Under Vermont law, we will not share information we collect about Vermont residents with companies outside of our corporate family, unless the law allows. For example, we may share information with your consent, to service your accounts or under joint marketing agreements with other financial institutions with which we have joint marketing agreements. We will not share information about your creditworthiness within our corporate family except with your consent, but we may share information about our transactions or experiences with you within our corporate family without your consent.

California: Under California law, we will not share information we collect about you with companies outside of Vestwell, unless the law allows. For example, we may share information with your consent, to service your accounts, or to provide rewards or benefits you are entitled to. We will limit sharing among our companies to the extent required by California law.