

RPg Investment Advisory Privacy and Cyber-Security Practices

RPg Investment Advisory is committed to protecting the privacy and security of our clients' non-public, personally identifiable information. We have developed a privacy policy and are focused on the continuing improvement of our cyber-security practices. We would like to take this opportunity to provide a summary of our policies and practices for your review. Please feel free to contact us at any time if you have questions about these or any of our other policies.

How We Gather Information

As part of providing you with financial products or services, we may obtain information about you from the following sources:

- From applications, forms, and other information that you provide to us, whether in writing, in person, by telephone, electronically or by any other means. This information may include your name, address, employment information, income, and credit references;
- Through your transactions with us,
- General information from other outside sources, such as data from public records, that is not assembled or used for the purpose of determining your eligibility for our products or services;
- As required by the USA PATRIOT Act, we also collect information and take actions necessary to verify your identification;
- If our customers visit a RPg Investment Advisory internet website, we may occasionally use a "cookie" in order to provide better service, to facilitate our customers' use of the website, to track usage of the website, for certain administrative purposes, and to address security hazards. A cookie is a small piece of information that a website stores on a personal computer and which it can later retrieve.

How We Share Information

- We will disclose nonpublic information about you to your brokerage custodian or any successor in its role as clearing firm so that they may act on our behalf.
- RPg Investment Advisory may also share information with regulators, auditors or other vendors in their capacity as outlined in our agreements or as required by law. We may provide nonpublic information without your permission to third parties:
 - ❖ to respond to a subpoena or court order, judicial process or regulatory authorities;
 - ❖ to consumer reporting agencies, in accordance with the Fair Credit Reporting Act;
 - ❖ in connection with a proposed or actual sale, merger, or transfer of all or a portion of a business or an operating unit;
 - ❖ to protect against fraud.

RPg Investment Advisory will not share your public or private information with any third party, other than to conduct your business, as required by law, or as you instructed or requested us to do (such as your request to share information with your accountant, etc.).

Cyber-Security Program

RPg Investment Advisory has established technology practices designed to allow its business to provide services to you using electronic systems, platforms and vendors. In selecting these technology systems and providers, we have worked to identify firms that will assist us in avoiding and mitigating cyber risks. We will continue to review our existing providers and systems and work with those providers in order to identify and mitigate potential risks. In our work to mitigate risks, we will conduct testing and other practices to ensure that we take all reasonable steps to prevent intrusion into our systems.

Please also take care in the conduct of your personal electronic communications and activities. Use strong passwords, and change them periodically. When possible, select a phrase that is long but easily remembered by you. Do not send your social security number, date of birth or copies of your financial or tax statements via email or text messages. There has been a sharp increase in hacks of consumer personal email, which results in the hacker accessing signatures and other information. With this information, hackers have been able to access bank and investment accounts and steal funds and securities.

Business Continuity Program

In the event of any emergency, the safety of the employees and guests of RPg Investment Advisory is its primary concern, and we will take every step to ensure the safe evacuation of all persons in the office.

RPg Investment Advisory has developed procedures designed to ensure the safety of all its business and client records in the event of any disruption to its office operations in Pleasanton. In the event of any emergency such as a fire, flood or earthquake, the daily operations of client portfolio management may continue via remote access to the Firm's systems. All company and investment electronic records are backed up electronically daily.

The Firm will continue to focus on the safety and security of Firm and client records. Any potential breach or loss of data will be reported to clients and regulators immediately.