



Privacy Policy

ClearView by KDI, LLC/ClearView Fiduciary Alliance (the “Company”, “we”, or “us”) is committed to respecting your privacy and the personal information you share with us in accordance with our policies. This Privacy Policy (“Policy”) applies to you if you use this website (this “Website”) or receive the ClearView publications, and any time you contact the Company through the Website, via email, or otherwise, submit a request for information, proposals, or engage in any other activity through the Website in which personal information is provided to us. The information below describes the manner in which the Company uses and protects your personal information once received. If you are a ClearView member (including our members’ employees, advisers, Board or Committee or related persons), then separate privacy terms may be provided to the member directly or posted on another website through which the member receives services.

The Company reserves the sole discretion to change this policy by updating this page. You should review this page periodically to ensure that you are comfortable with any changes.

Details about collection and use of data

The information we collect varies depending on your activity and use of the services or products offered by the Company. This Policy describes our practices with respect to the Website and any time you contact the Company through the Website.

Categories of Personal Information

We collect the following categories of personal information:

- **Contact and/or Personal Information** – including your name, telephone number, address, and email address and other information you provide through our website messaging portal or send to the Company by email or another electronic means. By submitting information to the Company on or through this Website or through any other means, you acknowledge that you have read this Policy, understand it, agree to its terms, and authorize the Company to collect, use and disclose information pursuant to this Policy.
- **Data on how you use this Website** – including your URL clickstreams, pages viewed, how long you view our pages, how often you visit our Website, and other similar information
- **Browsing information** – including the website you came from, the website you visit next, and other similar information. Such information is collected through cookies and other technologies described below. We do not use and do not intend to use such information to personally identify an individual.
- **Cookies** – We use cookies when you use this Website. These may be ‘session’ cookies, meaning they delete themselves when you leave the Website, or ‘persistent’ cookies which do not delete themselves and help us recognize you when you return so we can provide a tailored service. However, you can block our usage by adjusting your browser settings to refuse cookies.

Recipients / Categories of Recipients

Your personal information may be shared with:

- **Our service providers** – including, as applicable, IT service providers, commercial email providers, security consultants, and other vendors we engage so that they may provide services to us or on our behalf; payment processors. All information sent or collected through this site is shared with Fairview Investment Services, LLC, its agents and/or affiliated entities.
- **Your Adviser/Client** – consistent with the ClearView Fiduciary Alliance Member Services Agreement, ClearView may share Member organization data with the designated Member representatives, including designated employees, Board Members, Committee Members and external Investment Advisers.



- **Other third parties** – pursuant to a regulatory request or subpoena and/or when we believe it is required by, or necessary to comply with, applicable law. We may also provide your personal information to third parties when you ask us to do so.

Data Retention and Protection

Your personal data is generally stored until we receive a request to remove it or as otherwise required by internal policies and procedures, applicable law and/or contractual terms. Data we collect is stored in the United States and Canada. The Company uses reasonable physical and technical measures to prevent unauthorized access or loss, and/or unlawful processing. Usage of this Website is not permitted outside of the U.S.

We do not use your personal data for automated decision-making or profiling.

Information about processing of personal data

Purpose for Processing

The personal data we collect will be used for the following purposes:

- **Marketing purposes** – including sending you emails regarding regulatory updates, service offerings, and other content.
- **Internal business operations** – including (1) providing you with information pursuant to a request, responding to inquiries, and providing our services (including: ClearView Membership services, educational training, consulting and fiduciary related research.); (2) communication with you regarding the ClearView Fiduciary Alliance and its services; (3) compliance with our legal obligations; (4) in response to court orders or regulatory requests and in exercising our legal rights; and/or (5) in protecting our and our members' rights and property.

Legal Bases for Processing

Our legal basis for processing your personal data that we receive through the Website is based on one or more of the following legal bases:

- **Your consent** – *By submitting information to the Company on or through the Site, a User acknowledges that he or she has read this Policy, understands it, agrees to its terms, and authorizes the Company to collect, use and disclose information pursuant to the terms of this Policy.*
- **Processing is necessary for the performance of a contract** to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- **To comply with your instructions**
- **As is necessary for our legitimate interests**, including direct marketing or fulfilling a service obligation; and/or
- **To comply with the law and our legal obligations.**

Information Sharing and Disclosure

Your personal information may be shared with:

- **Our Affiliates** – In such cases, the Affiliates receiving the information are subject to this Privacy Policy.
- **Our service providers** – including, as applicable, IT service providers, commercial email providers, security consultants, and other vendors we engage so that they may provide services to us or on our behalf; payment processors.
- **Other third parties** – pursuant to a regulatory request or subpoena and/or when we believe it is required by, or necessary to comply with, applicable law. We may also provide your personal information to third parties when you ask us to do so. All information sent or collected through this site is shared with Fairview Investment Services, LLC, its agents and/or affiliated entities.

Know Your Rights

You have various legal rights regarding how your personal data is collected and processed. Your rights vary depending on the jurisdiction and laws applicable to you, which may include those described below. Where applicable, you may



exercise your rights by contacting us as provided below in “Contact Us with Any Questions or Concerns”. In reviewing your request, we may request additional information, as reasonably necessary to understand and authenticate the request.

- **The right to access information we hold on you.**
If applicable, you may request additional information about: (1) the categories of data we’re processing; (2) the purposes of data processing; (3) the categories of third parties to whom the data may be disclosed; (4) how long the data will be stored (or the criteria used to determine that period); (5) your other rights regarding our use of your data. We will provide you with the information within one month of your request, unless doing so would adversely affect the rights and freedoms of other (e.g. another person’s confidentiality or intellectual property rights). We’ll tell you if we can’t meet your request for that reason.
- **The right to opt-out of marketing communication.**
If you have previously given consent to our processing your data, you can freely withdraw such consent at any time. You can do this by emailing us at Jmcglothlin@Clearviewfiduciary.com. If you withdraw your consent, and if we do not have another legal basis for processing your personal information, then we will stop processing it. If we do have another legal basis for processing your information, then we may continue to do so subject to your legal rights. You may also object to processing of your data if processing is based on a legitimate interest.
- **The right to remove or erase personal data or contact information (“right to be forgotten”).** You can do this by asking us to erase any personal data we hold about you, if it is no longer necessary for us to hold the data for purposes of your use of the Website.
- **The right of data portability where we process your personal information based on your consent.** You may ask us to transfer your personal data to you or another third party upon request by contacting us at Lcoats@Clearviewfiduciary.com.
- **The right to correct any inaccurate personal information about you that is incorrect or incomplete. You also have the right to restrict or suspend processing of your personal data or make corrections.** You can complete any or all the above by sending a request to Jmcglothlin@Clearviewfiduciary.com.
- **The right to submit a complaint.** If you have questions or complaints regarding our Policy or our privacy practices, please contact us at Lcoats@Clearviewfiduciary.com. While we would appreciate the opportunity to address your concerns, you may also submit complaints to relevant supervisory authorities.
- **California Privacy Rights** Under California Civil Code Section 1798.83 (the “Shine the Light”), California residents may request and obtain a list of personal data we disclose to third parties for their own direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made once a year per person to the email address below and are free of charge. We do not disclose personal data protected under the "Shine the Light" law to third parties for their own direct marketing purposes.

[Links to Third-Party Sites](#)

For your convenience and informational purposes, this Website may include hyperlinks to third-party websites. We do not attest to the content found on those sites and the user assumes the risk of use. Once you have left our Website, you should check the applicable privacy policy of the third-party website to determine how they collect information from you.

[Children’s Privacy Protection](#)

This Website is not directed towards children under 13 years of age, and Fairview does not knowingly collect any information from children under 13 years of age through this Website. If you are under 13 years of age, you are not permitted to submit any information to Fairview through this Website or any other means.



No Rights of Third Parties

This Policy does not create rights enforceable by third parties.

Changes to this policy

The Company reserves the sole discretion to change this policy by updating this page. We will use reasonable efforts to notify you of any material changes to this policy, such as by sending you the revised policy by email or posting a notice on our website. This policy is effective from May 25, 2018.

Contact Us with Any Questions or Concerns

Please contact Jmcglothlin@Clearviewfiduciary.com if you have any questions or concerns regarding our collection, use or disclosure of your personal information.

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