

# INTERNET PRIVACY POLICY

Blue Trust, Inc. (“Blue Trust”) values your business and is committed to safeguarding the information we collect about you online. Information we gather is shared only with outside organizations that are performing services for us or on our behalf, or as permitted or required by law. Please review this Policy to help you better understand our views and practices regarding privacy on our website. If you are a California resident, you may have additional privacy rights under California law, which are described in our [California Privacy Policy](#). Finally, if you are a customer of Blue Trust, refer to our [Privacy Notice](#) for information regarding our collection and use of your nonpublic personal information. This policy is effective as of 12/04/2023.

## **Q: What information do we gather on our website?**

**A:** If you are a client of Blue Trust, to access your account information online, you will need to provide your user name and password on the BluePort Website. To enroll in this service, you need to contact your Advisor or Client Service Associate (CSA).

Blue Trust will never ask you to provide or confirm your personal information through an email unless you have requested such an email or transaction from us. Never respond to an email (especially unsolicited email) which asks for your personal or account information.

In other sections of our website (e.g. Contact Us forms), we may capture additional information you may supply including your name, email address, phone number and other personal information in order to fulfill your request.

## **Q: What other information do we capture?**

**A:** Blue Trust's web server automatically recognizes only your IP address when you visit our site as an anonymous visitor (without logging in to the BluePort Website). It does not recognize your email address. However, we do collect your email address if you communicate with us via email.

If you enroll in our BluePort Website, please keep your personal information, including your email address and phone number, update to date. Your name, email address, phone number and Advisor's name will be used by you to request Login Help. You may update any of your personal information by calling your Advisor or CSA. Your password or preferences may also be updated on the BluePort Website.

When you visit our website, we collect data about your activities that does not personally or directly identify you. We may use a variety of technologies that automatically or passively collect aggregate information about how our websites are accessed and used (“Usage Information”). Usage Information may include browser type, device type, operating system, application version, the page served, the time, the preceding page views, and your use of features or applications on the website.

If you access or service your accounts online using your user name and password to authenticate yourself, a record of your online activity is maintained.

## **Q: How can you update the personal information you provide online?**

**A:** You can update your password and document delivery preferences on the BluePort Website if you a BluePort user. To change your password or preferences, log onto the BluePort Website and select the My Profile link All other information about your account or online access must be updated by calling your Advisor or CSA.

## **Q: How do we secure the information we collect?**

**A:** Blue Trust has standards of security to protect your data by putting in place physical, technical and administrative safeguards. The technology we use to protect your data is reviewed and improvements are implemented as needed.

Authorized employees and representatives are permitted to access and use data about you for approved business purposes. All employees and representatives must complete all required training to ensure they understand and follow established policies and laws when using your data.

Your information may be accessible by third party vendors for the purpose of enabling them to store such data in connection with the permitted uses of your information under this Internet Privacy Policy. Our third-party website providers have an obligation to maintain the confidentiality of the information, except where disclosure is required by law.

## **Q: What do we do with the information we gather?**

**A:** We use the information we gather about our site visitors in one or more of the following ways:

- To fulfill requests for additional information.
- To fulfill your requests for contact from a Blue Trust customer service representative.

- To help ensure a safer online environment for all site visitors.
- For general aggregate site visitor analysis and statistical research.
- To increase visitor satisfaction in their online experience with Blue Trust.
- To aid in problem resolution if you experience technical difficulties while using our website.
- To learn about opportunities to market other services that may be of interest to you and to market those services to you.
- To provide you with security information to assist you in accessing the BluePort Website.

**Q: How do you opt out of data sharing and email marketing?**

**A:** For email marketing that you are receiving from us, please choose “unsubscribe” within the email itself to opt-out of future email marketing.

**Q: How do we respond to "Do Not Track" signals?**

**A:** Blue Trust does not respond to "Do Not Track" signals. This Internet Privacy Policy describes Blue Trust’s use of cookies and information tracking.

**Q: Do we use cookie technology?**

**A:** Yes, Blue Trust's website uses cookie technology. Cookies are a technology storage mechanism. Specific pieces of information, some of which may be personal, such as an IP address, are contained within a cookie. Most often though, the cookie will contain anonymous unique identifiers given to your web browser by a web server. The browser stores the cookie on your device. The cookie, and any information contained within it, is sent back, via a web beacon, to the server each time your browser requests that site.

The information within the cookie might be about you, your preferences, or your device, but mostly, cookies are used to make the site work as you would expect it.

We generally employ four types of cookies.

- **Necessary:** These cookies are necessary for the website to function and cannot be switched off in our systems. They do not store any personally identifiable information.
- **Performance:** These cookies allow us to count visits and traffic to our sites so we can improve the site’s performance. All information contained in these cookies are aggregate and anonymous and it is recommended that they not be turned off.
- **Functional:** These cookies allow our website to provide you with customized services or personalization and increase the quality of your online experience. These cookies may be set by us or a third party on our behalf.
- **Targeting:** Third parties may use cookies on our behalf to analyze how users use our website. In this case, the third party is acting as a service provider to Blue Trust so that we can market more effectively.

Keep in mind that cookies:

- Cannot be used to reveal your email address obtained from your hard drive or learn confidential or personal information about you that you have not already explicitly revealed.
- Cannot read data off your hard drive or read cookie files created by other sites.
- Are not executable programs and cannot damage your computer or the files on your device.

**Q: How can you set or delete your computer’s cookies?**

**A:** You can set your computer's browser to opt-out of receiving and storing cookies; however, doing so may limit your access to certain sections of our site. You also can delete cookies stored on your computer's browser.

If you have previously selected to have bluetrust.com remember your device, deleting cookies will disable this feature. The process to set or delete cookies differs by browser. See your browser's Help feature or contact the manufacturer for instructions on how to set/delete your browser's cookie options.

**Q: Do we use web beacons?**

**A:** Yes. Web beacons (also known as web bugs, pixels, and page tags) are the mechanism by which cookies, and their data, are transferred across the internet. In other words, web beacons and cookies work in conjunction with each other to monitor the behavior of site visitors. Blue Trust uses web beacons on our website and in email communications for aggregate statistical purposes and marketing conversion tracking.

**Q: Do we use encryption technology?**

**A:** Certain areas on Blue Trust's website have been built to handle confidential information. These pages utilize an internet method known as Secure Socket Layers (SSL). With SSL, pages are sent to you in an encrypted (scrambled) format and any information you submit to Blue Trust also is encrypted. Encryption is the transformation of data into a form unreadable by anyone who doesn't have the appropriate decryption key. This method of transferring confidential data is considered the industry standard for the Internet.

For added security, close your browser completely when you finish using this website. While you are on the internet, your browser is using part of your computer's memory. If your browser is left open, it may be possible for someone using your computer to go back and use this memory to access your information. Closing your browser will clear this memory. Another action to consider would be to clear your browser's temporary files.

For your security, we highly recommend maintaining an updated browser version that supports SSL. Microsoft Internet Explorer, Mozilla Firefox and Apple Safari are three browsers that support these encryption techniques. A solid lock graphic will display when the SSL mode is engaged to reflect the connection is encrypted. If you are not sure if your browser is compatible, check with your service provider.

Blue Trust has taken steps to make all information you provide to us as secure as possible against unauthorized access and use, alteration, and/or loss. This information is kept in Blue Trust's secure database. You should keep in mind, however, that no data transmission over the Internet is 100% secure and any information disclosed online can potentially be intercepted and used by unauthorized parties.

**Q: What is our policy for children?**

**A:** Your children's safety is important to us. We have developed our privacy guidelines in compliance with the requirements outlined by the Federal Trade Commission Children's Online Privacy Protection Act (COPPA). We do not knowingly solicit, collect, or use personal information from children under the age of 13. No information should be submitted to or posted on our site by children under 13 years of age without the consent of their parent or guardian. We encourage you to participate in your children's online experiences and ask that all children have their parent's or guardian's permission before sharing any personal information on our website.

**Q: What about links to other websites from Blue Trust's site?**

**A:** The Blue Trust website contains links to other external websites. Although our intent is to provide links to other quality sites, we cannot guarantee the safety and privacy of information you provide to these linked sites. Any data or personal information collected by websites other than Blue Trust is not covered by this privacy policy.

**Q. What about transmission of data to other countries?**

**A.** Your personal information is processed in the United States, where privacy laws may be less stringent than the laws in your country and where the government, courts, or law enforcement may be able to access your information. By submitting your personal information to us you agree to the transfer, storage and processing of your information in the United States.

**Q: Can this policy change?**

**A:** This policy is subject to change. If we make changes to this policy, we will revise the effective date as noted above. Please review this policy periodically.

If you have questions regarding our Internet privacy policy, you can send an email message to [BlueTrustCompliance@bluetrust.com](mailto:BlueTrustCompliance@bluetrust.com), call us at (833) 342-0984, or send a written request to:

Blue Trust  
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