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MOMENTUM INVESTING, LLC

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PRIVACY POLICY

Policy Effective Date: July 15th, 2016

Protecting your privacy is an essential part of how we earn and keep your trust. This Privacy Policy will describe how we gather and protect your information. Should you have additional questions please do not hesitate to contact us at info@etfmi.com or (317) 941-0908.

INTRODUCTION

For the purpose of this agreement a “User” is an individual who uses our website or speaks with one of our associates either for educational purposes, recreational purposes or to evaluate our methods, performance, and automated investment service (“Service”). A “Client” is an individual who signs our Investment Advisory Agreement that entitles the Client to have her or his investment portfolio managed by ETF Momentum Investing, LLC.

INFORMATION COLLECTION

As a User we may collect personal information such as name, address, email, telephone number and other optional information you may provide, such as your age, investable assets, and risk tolerance, financial goals and objectives, income information and other similar household data. If you choose to become a Client, in addition to the information we collect from you as a User, we will ask you for, but not limited to, your full legal name, contact information, birth date, Social Security Number, citizenship, and other regulatory disclosures that may be necessary and required under Federal and statutory law.

INFORMATION SHARING

We will share your Personal Information as required by law or requested by regulatory authorities. ETF Momentum Investing, LLC agrees to maintain your non-public Personal Information in strict confidence. We may share your Personal Information with trusted third parties who are integral to the operation of our Website and Services, including but not limited to financial institutions, payment processors, verification services and credit bureaus.

YOUR CHOICES REGARDING YOUR INFORMATION

You may request deletion of personal information by emailing info@etfmi.com and providing us enough information to identify your account and prove that you are the owner of the identified account. However, we may retain residual information related to your account, as well as any data related to your trades, in accordance with applicable laws. In no case will we share any individual trading data unless required by regulators or other government bodies.

You may decline to provide personal information to ETF Momentum Investing, LLC. Declining to provide personal information may disqualify you from ETF Momentum Investing, LLC services and website features that require such.