

FACTS	WHAT DOES NDVR, INC. (“NDVR”) DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal 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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Name, email address, mailing address, social security number, date of birth, signature • Financial account number, financial account balances, wire transfer instructions, trading history, payment history • Net worth, assets, income, investment experience, risk tolerance, employment information <p>When you are no longer our customer, we continue to share information about you as described in this notice.</p>
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 NDVR chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does NDVR Share?	Can You Limit Sharing?
For our everyday business purposes - such as to process your transactions, maintain your accounts(s) or respond to court orders and legal investigations.	Yes	No
For our marketing purposes - to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
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	We don't share
For affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share

To limit our sharing	<ul style="list-style-type: none"> • Call us at 1-857-326-6992. • Mail your request to NDVR Inc., Attn: Privacy, 24 Federal Street, Boston, MA 02110. <p>Please note:</p> <p>If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
Questions?	<ul style="list-style-type: none"> • Call 1-857-326-6992 or go to www.ndvr.com.

WHO WE ARE	
Who is providing this notice?	NDVR, Inc., a registered investment advisor, and its affiliates listed below.
WHAT WE DO	
How does NDVR protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. We protect your personal information in the following ways:</p> <ul style="list-style-type: none"> • We only grant access to parties with whom we have executed confidentiality/nondisclosure agreements and who need that information to serve you or to assist us in conducting our operations. • We have physical and electronic safeguards in place to ensure that we comply with our own policy, industry practices, and federal and state regulations. • Our employees are trained in the proper handling of personal information.
How does NDVR collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> • Enter into an investment advisory contract • Seek financial advice • Make contributions to or withdrawals from your account • Tell us about your investment or retirement portfolio • Give us your employment history <p>We also collect your personal information from others, such as credit bureaus, affiliates or other companies.</p>
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—information about your creditworthiness • Affiliates from using your information to market to you • Sharing for nonaffiliates to market to you <p>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"> • NDVR Labs Kft.
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • NDVR does not share with nonaffiliates so they can market to you.
Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • NDVR does not jointly market.
OTHER IMPORTANT INFORMATION	
To learn more about our privacy practices, please go to https://ndvr.com/privacy/ .	