



HANLON

— ADVISORY SOFTWARE —

FACTS	What does Interactive Advisory Software, LLC d/b/a Hanlon Advisory Software (“HAS”) 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"> • Social Security number • Assets • Account Transactions • Employment Information • Income • Investment Experience <p>When you are no longer our customer, we continue to share your information 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 HAS chooses to share; and whether you can limit this sharing.																									
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%;">Reasons we can share your personal information</th> <th style="width: 20%;">Does HAS share?</th> <th style="width: 20%;">Can you limit this sharing?</th> </tr> </thead> <tbody> <tr> <td>For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td>For our marketing purposes— to offer our products and services to you</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td>For joint marketing with other financial companies</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td>For our affiliates’ everyday business purposes— information about your transactions and experiences</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td>For our affiliates’ everyday business purposes— information about your creditworthiness</td> <td style="text-align: center;">No</td> <td style="text-align: center;">We don’t share</td> </tr> <tr> <td>For our affiliates’ to market to end clients of investment professionals utilizing HAS services</td> <td style="text-align: center;">No</td> <td style="text-align: center;">We don’t share</td> </tr> <tr> <td>For non-affiliates to market to you</td> <td style="text-align: center;">No</td> <td style="text-align: center;">We don’t share</td> </tr> </tbody> </table>			Reasons we can share your personal information	Does HAS share?	Can you limit this sharing?	For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No	For our marketing purposes— to offer our products and services to you	Yes	No	For joint marketing with other financial companies	Yes	No	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 our affiliates’ to market to end clients of investment professionals utilizing HAS services	No	We don’t share	For non-affiliates to market to you	No	We don’t share
Reasons we can share your personal information	Does HAS share?	Can you limit this sharing?																								
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No																								
For our marketing purposes— to offer our products and services to you	Yes	No																								
For joint marketing with other financial companies	Yes	No																								
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 our affiliates’ to market to end clients of investment professionals utilizing HAS services	No	We don’t share																								
For non-affiliates to market to you	No	We don’t share																								
Questions?	Call (888) 641-7100. If we serve you through an investment professional, please contact them directly. Specific mailing addresses and telephone numbers are listed on your statements and other correspondence.																									

Who we are	
Who is providing this notice?	Interactive Advisory Software, LLC d/b/a Hanlon Advisory Software
What we do	
How does HAS protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does HAS collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Open an account • Provide employment information • Provide account information • Give us your income information • Give us your contact information <p>We also collect your personal information from others, such as affiliates, custodians, 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 non-affiliates 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> <p>HAS affiliates include:</p> <ul style="list-style-type: none"> • Hanlon Financial Group, LLC • Hanlon Investment Management, Inc.
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • HAS does not share with non-affiliates 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"> • HAS has marketing partners that include other financial services companies.
Other important information	
<p>This notice applies to all prospective, current and former business partners, investment professionals and clients. This notice replaces all previous notices of our consumer privacy policy, and may be amended at any time. We will keep you informed of changes or amendments as required by law.</p>	