



FAMILYOFFICENETWORK, LLC

Safe Harbor Privacy Policy

Harbor Standards

This Safe Harbor Privacy Statement defines the privacy principles we adhere to, in accordance with the transfer and protection of "personal information" collected from the European Union or Switzerland.

About The Safe Harbor

In June 2000, the United States Department of Commerce and the European Commission created the "Safe Harbor" program establishing data protection principles between U.S. companies and their European Union based clients. The program describes the methods of transferring personal information from the European Union and Switzerland to U.S. based companies. Certification is voluntary, and those who make the effort to self-certify illustrate that they are upholding privacy standards for personal information received from the European Union.

FamilyOfficeNetwork L.L.C. recognizes and respects the privacy expectations of our advisors and their clients. Clients of licensed advisors entrust them with their personal and financial data. FamilyOfficeNetwork® considers client data (data uploaded to FamilyOfficeNetwork's servers by licensed advisors and their clients) to be private and confidential. FamilyOfficeNetwork® holds itself to the highest standards of trust and fiduciary duty in its safekeeping and use of all data; including adherence to the Safe Harbor privacy policies and the 15 FAQ's that make up the Safe Harbor Framework.

Data Collection / Usage

Clients are originally entered into the FamilyOfficeNetwork® data base by their primary advisor who then controls access to the client by granting sharing rights subject to the approval of the client. At the client's request, the primary advisor may be changed to another licensed advisor. Only one advisor can be "primary." All other advisors, licensed or guest, have access to the client as long as permitted by the primary advisor.

The client, primary advisor, and all other licensed advisors can post documents and secure notes to the site. The advisor posting a document controls access to the document and may exclude any other advisor from document access on a document by document basis. Guest advisors have "view-only" access and cannot post documents. Document transmission is at 256 bit SSL security. Non-secure emails are used to notify the client and advisors of the existence of files and notes. A special folder is provided for "attorney/client privileged" correspondence. No document can be modified on the web, and only the advisor posting the document has the ability to delete it.

FamilyOfficeNetwork® provides it secure web service for the benefit of clients and their advisors to post and maintain documents, in all formats, of their choosing. FamilyOfficeNetwork® has no access to or control of the content of any document.

Client information collected by FamilyOfficeNetwork® for the purposes of website administration only consist of the client "user name," email address, and primary advisor only. FamilyOfficeNetwork® cannot access any other client information.

Advisor information consist of the advisor's name, contact information, firm description, firm logo, advisor picture, and client list (as noted above). This information is generally available on the advisor's public website or is updated by the advisor. It is also available through the website for the advisor's clients and other shared advisors.

Information available to the client, primary advisor, and shared advisors includes: non-public personal information about clients from the following sources:

- Information entered into the client's notes or email advisors section
- Files uploaded by advisors that have access to a client's account.
- FamilyOfficeNetwork does not have access to information posted by clients or advisors.

It is the responsibility of the Primary Advisor to receive prior consent before sharing a client.

It is the responsibility of each advisor to inform his/her clients of the reason for and risks associated with sharing client information with their other advisors.

FamilyOfficeNetwork® has no control over or access to posted client information, and it takes no responsibility for how the advisors or clients use or manage data within the system.

FamilyOfficeNetwork® only use information about clients and advisors to manage and administer the database. Access to data on the server, either physical or otherwise, is limited to only the programming team and project manager subject to 7/24 live security and double fingerprint id screening.

We do not sell or distribute advisor or client information to any third party.

Information about terminated advisors and clients will be permanently deleted from our servers in appropriate time determined on a per case basis.

Terminated advisors may request information to be sent to them in an electronic format prior to deletion of the client account. Client termination is initiated by the primary advisor and requires no action by FamilyOfficeNetwork®. Advisor termination is completed by FamilyOfficeNetwork® administration.

Security

FamilyOfficeNetwork® is committed to ensuring the security of your information using 256-bit AES encryption. Other reasonable precautions are taken to protect individuals from loss, misuse and unauthorized access, disclosure, alteration, and destruction of personal data.

FamilyOfficeNetwork® agrees to use its best efforts to ensure that client information is accurately and securely maintained on the Network and accessible only to authorized Users. Users acknowledges, however, that FamilyOfficeNetwork® cannot guarantee the security of client information and that it cannot control the actions of the use of information deposited on the Network by participating advisors and clients. User, therefore, waives all claims and holds FamilyOfficeNetwork® harmless for any security failure, loss of client information, or misuse of client information by users or other.

Arbitration

In the event a dispute cannot be resolved, the parties agree to submit to binding arbitration with a representative of the American Arbitration Association. All decisions of the arbitrator shall be binding on all parties.

Enforcement

Please note that any questions or concerns regarding this Privacy Policy can be emailed to support@familyofficenetwork.com. FamilyOfficeNetwork® accepts responsibility for addressing the issue(s) and personally contacting the concerned party. If necessary, FamilyOfficeNetwork® agrees to comply with appropriate regulatory bodies in order to resolve any issues regarding commitment to our Privacy Policy and adherence to the Safe Harbor Principles.

In an attempt to maintain an accurate, comprehensive, accessible, and fully implemented privacy policy, revisions may be made in the future. If you would like a current copy of our privacy policy, you may view it on our web site, at www.familyofficenetwork.com, or by calling (866) 801-1553.

Additional questions or concerns regarding our Privacy Policy can contact us at (866) 801-1553 or email support@familyofficenetwork.com