

NEWDAY

Privacy Notice

Effective January 1, 2018

Protecting your privacy is fundamental to the way Newday Funds, Inc. (“Newday”) conducts business. Investment Advisors are required by law to inform you of our policies regarding privacy of client information. Federal law gives consumers the right to limit some but not all sharing. The *Privacy Notice* explains the types of information we collect from our individual clients and/or users in order to provide investment advisory services (“Services”); how we may use or disclose that information; and the measures we take to safeguard that information. Please read this notice carefully to understand what we do.

Client Information Collected

We collect non-public personally identifiable information about you that is either provided to us by you through the Newday web site located at www.newdayinvesting.com and the associated mobile application known as “Newday” or obtained by us with your authorization. We refer to all of this information as “Client Information”. This information can include:

- Contact Information such as name, email address, mailing address, phone number
- Financial Information such as bank or brokerage account numbers, investment objectives, financial goals and risk tolerance
- Social Security number
- Driver’s License or other state issued ID
- Date of Birth
- Unique Identifiers such as user name, account number, password
- Income and source of income
- Investment objectives, financial goals and risk tolerance
- Banking information and credit card numbers or information

When you download or use our Services, we automatically collect information on the type of device you use, operating system version, and the device identifies (or “UDID”). We do not collect you location based information.

Information Shared

Newday uses and discloses client information only as follows:

- To analyze site usage and improve products and services
- To provide advice and information to help you meet your investment objectives
- To deliver to you any account alerts, administrative notice and communication regarding your use of the Service
- To fulfill our obligations to the SEC, FinCEN, OFAC, and any other regulatory or government body to whom we are required to report or to fulfill certain background checks relating to the USA Patriot Act .

In order to provide our Services, we may disclose Client Information to non-affiliated third companies that perform services for us, such as companies that provide transaction processing and statements of account for assets under management. Agreements with such third companies include assurances regarding the protection of customer records and information.

In the event that you utilize a Service brought to you by one of our co-brand partners, through a co-branded URL, your email address used for registering on the Site and/or App may be provided to that co-brand partner.

We may disclose Client Information to non-affiliated third parties for other purposes required or permitted by law or regulation. Such necessary disclosures may include:

- To comply with a court order, legal process, or other judicial or investigative proceeding that produces a request for information from us; or
- To fulfill or respond to a request from you or your authorized agent.

To Limit Our Sharing

As a client or user you have the option to prohibit disclosure of your nonpublic personal information to non-affiliated third parties for marketing purposes, if we make such a disclosure. This is referred to as an “opt-out” right. We only disclose such information with your prior written consent, so it not necessary to provide you with the opportunity to opt-out of having your information disclosed in this manner. If a state law requires us to give you the right to opt-out prior to disclosure of your personal information, we will not disclose your information for such purposes without your consent.

Cookies and Tracking Technologies

A cookie is a small text file that is stored on a user’s computer for record keeping purposes. Newday uses cookies on our site. We do not link the information we store in cookies to any personal identifiable information you submit while on our site.

We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your internet browser’s “help” directory.

We employ a software technology called clear gifs, that help us better manage content on our site by informing us what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user’s computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence. We do not tie the information gathered by clear gifs to our client’s personally identifiable information.

How We Protect Your Information

All Newday employees are bound by professional standards of conduct, to protect the confidentiality of Client Information. When you enter sensitive information, such as banking information, on our app, we encrypt the transmission of the information using secure socket layer technology (SSL). We follow generally accepted standards to protect personal information submitted to us, both during transmission and once we receive it. No method of transmission over the internet, or method of electronic storage is 100% secure, however. We maintain commercially reasonable physical, electronic, and procedural safeguards to protect Client Information from unauthorized access and disclosure.

Changes to this Policy

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will notify you by email or by means of a notice on this Site prior to changes becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Former Clients

If you are no longer a client of Newday, we continue to use, disclose and safeguard Client Information as described above.

Contact Us

If you have any question about our Privacy Policy, you can be reach us at:

Newday
18 Bartol
San Francisco, CA 94133
info@newdayinvesting.com