

AGHAZ INVESTMENT ADVISORS, LLC

Phone: (425) 202-6196
Email: info@aghazinvest.com

January 2023

Privacy Policy

Investment Advisers are required by Federal law to inform their clients of their policies regarding privacy of client information. Aghaz Investment Advisers, LLC (referred to herein as the “Company” or “Firm” or “Aghaz”) appreciates the trust our clients place in us. We take our responsibility to protect the privacy and confidentiality of your information, including personal information, very seriously. We maintain physical, electronic and procedural safeguards that comply with applicable legal standards to secure such information from unauthorized access and use, accidental or unlawful alteration and destruction, and other unlawful or unauthorized forms of processing. We hold our employees accountable for complying with relevant policies, procedures, rules and regulations concerning the privacy and confidentiality of information.

As a registered investment adviser under the SEC Rule 203A-2(e) the Firm provides investment advice to advisory clients exclusively through an interactive website. Toward this end, the Company’s investment management services are offered online only to individual separate accounts (each a “Client” and collectively, “Clients”). As is true of many digital platforms, we collect certain information about you automatically through our websites, mobile apps, and other online offerings (collectively, the “Offerings”). Keeping this information secure is a top priority for us, and we are pleased to share with you our Privacy Policy:

1. We collect non-public personal information about our clients from the following sources:
 - a. Applications (e.g., brokerage account applications)
 - b. Our Investment Management Agreement
 - c. Records of accounts under our management
 - d. Other forms, correspondence, and communications
 - e. We collect information about your activity, which includes device identifiers (like IP address or mobile device identifiers), pages or features you use, time and date of access, and other similar usage information
 - f. Identity data, such as your name, date of birth, and other data on government-issued identification documents
 - g. Contact data, such as your email address, mailing address, and telephone number
 - h. Transactional information. When you receive, submit, or complete a transaction via the Offerings, we collect information about the transaction, such as transaction amount, type and nature of the transaction, and time and date of the transaction
 - i. Financial data, such as your bank account and payment card details, and information about your income, account balances, financial transaction history, credit history, tax information, and credit scores
 - j. Profile data, such as your username and password
 - k. Stored content, such as photos from your mobile phone gallery or contacts stored in your mobile device or email accounts. We only collect this information with your permission
 - l. Additional data you provide, such as via survey responses, customer support, or other means.
2. While using the Firm’s application, in order to provide features, the Firm may collect, with you prior permission: Information from your Device’s phone book (contacts list). We use this information to provide features of our service, to improve and customize our service. The information is not uploaded or stored to the Company’s servers. You can enable or disable access to this information at any time, through your device settings.
3. Location data. We may collect the GPS location of your mobile device in accordance with your device permissions. You can stop the collection of this precise location information at any time (see the Your Control section below for details). Google uses technologies to approximate your location, including IP address (see Google’s Privacy Policy located at <https://policies.google.com/privacy> to learn more about how they process this information). We also approximate your location by your IP address.
4. Information collected through tracking technologies. We and our service providers also use technologies, including cookies and web beacons, to automatically collect certain types of usage and device information when you use our Offerings or interact with our emails. The information collected through these technologies includes your IP address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp, a unique device or account ID, usage information and other similar information.
5. We maintain administrative, physical and electronic safeguards to protect non-public personal information.

6. If you link, connect, or log in to your Aghaz Account with a third-party service (e.g., Google, Apple), the third-party service may send us information such as your profile information from that service. This information varies and is controlled by that service or as authorized by you via your privacy settings at that service.
7. Advertising Data. We collect information in connection with our ad campaigns that surfaced on other platforms, such as the ads you clicked on and other interactions with our ads.
8. We may disclose non-public personal information about our clients and former clients to employees, independent contractors, or other third parties with whom we have contracted to perform services on our behalf, such as brokerage, legal, accounting, compliance, and data processing services, as well as in order to comply with legal and regulatory requests made to us, and to assist with law enforcement, investigations, complaints, regulatory requests, litigation, arbitration, mediation, and other legal processes.
9. Note that our Privacy Policy includes no right to disseminate non-public personal information about our clients and former clients to any external or third party for marketing or other purposes not directly related to servicing your account.
10. We may disclose non-public personal information about our clients and former clients as required by Federal, state, or local law. We will provide notice of changes in our information sharing practices. If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so you will have the opportunity to opt-out of such disclosure. In addition, we share information about you with third-party vendors and service providers who perform services for us, such as identification verification, fraud prevention, advertising, mailing services, tax and accounting services, contest fulfillment, web hosting, and analytics services.
11. The Firm uses third-party services. For example, we use Google Analytics and you can review the "How Google uses information from sites or apps that use our services" linked here: <http://www.google.com/policies/privacy/partners/> for information about how Google processes the information it collects. These companies collect information about your use of our Offerings and other websites and online services over time through cookies, device identifiers, or other tracking technologies. The information collected includes your IP address, web browser, mobile network information, pages viewed, time spent, links clicked, and conversion information. For more information about interest-based ads, including to learn about options for opting out of having your web browsing information used for targeted advertising purposes, please visit www.aboutads.info/choices. You should also review your mobile device settings and controls for features that allow you to opt out or opt in to having certain information collected for behavioral advertising purposes. Please note, as an investment adviser we do not advertise on behalf of specific securities or investment options on our Offerings.

Other Important Information:

- For California residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by law. We will not share information about your creditworthiness with our affiliates, as applicable, other than as permitted by California law, unless you authorize us to make those disclosures.
- For Nevada clients: Section 340 of the Nevada Privacy Law requires that an operator post a privacy policy, which is called a "notice" in Nevada. We are providing you this notice pursuant to state law. We will not share information we collect about you with nonaffiliated third parties, except as permitted by law. We will not share information about your creditworthiness with our affiliates, as applicable, other than as permitted by Nevada law, unless you authorize us to make those disclosures.
- For Vermont residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by law, including, for example with your consent or to service your account. We will not share information about your creditworthiness with our affiliates, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

Aghaz is an investment adviser registered with the Securities and Exchange Commission (The "SEC") under The Securities Exchange Act of 1934 ("The Act"), specifically as an Internet adviser relying on rule 203A-2(e), as well as with the Financial Industry Regulatory Authority (the "FINRA"). The Firm is committed to safeguarding the confidential information of our clients. We will provide notice of changes in our information sharing practices. If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so you will have the opportunity to opt out of such disclosure. We want to hear from you if you have questions. If you have any comments, questions or concerns about any of the information in this Privacy Policy, or any other issues relating to the processing of your personal information by Aghaz under this Policy, please contact your Aghaz contact, or:

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