

Morningstar Advisor Workstation Privacy Policy

Your privacy is very important to us. At Morningstar, we want to make your experience with us is satisfying and safe.

This Privacy Policy outlines the types of information we gather from your use of the product, how we use it, with whom we might share it, the means by which we keep it secure, and the choices you have about the information you choose to share with us. It is intended to supplement, rather than supersede any preexisting license agreements in place between you and Morningstar.

If you have any questions about the privacy practices of Advisor Workstation or this Privacy Policy, please contact your home office.

PERSONAL INFORMATION WE COLLECT

The types of personal information we collect depend on the product or service received from us. This information may include, but is not limited to:

- Personal Advisor Information: Advisor Name, phone number, physical and e-mail addresses
- Personal Client Information: Client Name, phone number, physical address, social security number/Tax ID, salary, and portfolio holdings

PERSONAL INFORMATION WHY WE COLLECT IT

Morningstar may collect certain personal advisor information to provide you, the advisor (“you”) with investment information and tools, to perform marketing and research related activities, to supply other administrative services (e.g., setting up new accounts), to respond to inquiries, etc. In addition we may from time to time review your usage of the site to be able to better provide you with information about products or services that we believe may be interest to you.

PERSONAL INFORMATION HOW WE COLLECT IT

The personal advisor information we collect may be captured from a variety of sources. These sources include, but are not limited to:

- Registrations/Applications to receive products or services
- Voluntary submissions (e.g., responses to surveys, requests for information on our products or those of our advertisers/marketing partners)
- Personal client information collected may be gathered from the following sources:
- Imported into the application by the advisor and/or institution using integration capabilities
- Input directly into the application by the advisor

USE AND ACCESS TO YOUR PERSONAL INFORMATION BY OTHERS

As a general rule, Morningstar will not make any personal Advisor or Client information gathered using Advisor Workstation available to anyone outside of Morningstar and its affiliates -- except as instructed by you or where required to comply with law. Please note,

however, that there are several exceptions to this policy. First, if we use service providers, these service providers may have access to Advisor or Client personal information to perform contractually specified services on behalf of Morningstar or you. Second, if you indicate that you are interested in receiving information about a particular third party's products/services, or you opt to receive certain products or services through Morningstar, we may provide Advisor personal information to that third party for purposes of fulfilling your request(s). With respect to service providers, Morningstar contractually requires that all personal Advisor or Client information be kept confidential. Additionally, Morningstar takes reasonable steps to ensure that third parties receiving information about you at your request maintain the confidentiality of that information.

LINKS TO OTHER WEB SITES

Morningstar may provide links to one or more other Web sites. We encourage you to read their individual privacy policies before providing any of your personal information to them.

PROTECTION OF YOUR PERSONAL INFORMATION

Morningstar puts reasonable security measures in place to protect against unauthorized access to, or unauthorized alteration, disclosure or destruction of personal Advisor and Client information. These measures include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data.

Morningstar operates secure data networks protected by industry standard firewall and password protection systems. Our security and privacy policies are periodically reviewed and enhanced as necessary and only authorized individuals have access to the information provided.

USE of COOKIES

Morningstar uses Cookies to set users' preferences, gather basic tracking information (such as login and password), date, time of visit and preferences, and monitor the presentation of our site. This information allows us to personalize the user experience and to improve the quality of our site navigation. Cookies do not reveal the identity of the individual user but only identify the computer utilized by that user.

ACCURACY OF PERSONAL INFORMATION

You are responsible for periodically checking to ensure that any Advisor and applicable Client personal information included is updated and correct.

HOW TO UPDATE PERSONAL INFORMATION

If you desire to update any personal information, you may do so by accessing Advisor Workstation.

WHAT ABOUT CHILDREN'S PRIVACY?

Morningstar does not separately identify, or collect, any information that is specific to children.

YOUR CONSENT

By using Advisor Workstation, you consent to the collection and use of any Advisor and Client personal information and any related information in the manner described in this Privacy Policy.

CHANGES TO THE PRIVACY POLICY

Morningstar reserves the right to change this policy at any time by distributing and/or posting a new privacy policy without notice. We encourage you to review our privacy policy on a regular basis so that You will be aware of any changes to it.

If You have further questions about our privacy practices, please contact your home office.