

Privacy Policy

The Darrow Company, Inc. (the “Firm”) is committed to the protection of your privacy. Depending on your relationship with the Firm, one or more sections of this Privacy Policy may apply to you.

The first section of the Privacy Policy relates to the firm’s web-based data collection and use practices, communication methods, and marketing/advertising practices, including, but not limited to, the firm’s website, social media accounts, e-mail communications, and CRM systems.

An [addendum](#) of the Privacy Policy specifically applies to clients of the firm; specifically, what does The Darrow Company, Inc. do with your financial information?

The Darrow Company, Inc. (the “Firm”) is committed to the protection of your privacy. In the course of using this Website, you may provide the Firm with information about yourself. The Firm works diligently to ensure that it has taken appropriate administrative and technical measures to prevent the unauthorized or unlawful use of your information, and to prevent any accidental loss or destruction of, or damage to, such information. This Privacy Policy explains how the Firm collects, uses, and safeguards information collected on the Firm Website.

The Firm reserves the right to amend this Privacy Policy at any time, for any reason. Any changes will appear on this page. By continuing to use this Website, you accept the present terms and conditions of this Privacy Policy.

Collection of Information

The Firm collects information about visitors to the Firm Website in two primary ways:

First, the Firm uses technologies that automatically collect and store Non-Personal Data as indicated below when you visit the Website, including sending one or more “cookies,” “web beacons,” or other anonymous identifiers to your device.

Second, you may also affirmatively provide information about yourself (“Personally Identifiable Information”), such as by using [contact forms](#) on the Website or by calling or e-mailing the Firm.

The Firm may keep any collected information for an unlimited period of time, or for the amount of time permitted by law.

Non-Personal Data

When you visit the Firm Website, the Firm may automatically collect certain Non-Personal Data such as:

- Your IP address and geographic location;
- The date and time you access the Firm Website

- Information about your device hardware and software.

The Firm may also place cookies on your computer to recognize you on return visits, to enhance your browsing experience, and to collect additional information about you for traffic analysis. Cookies are small files with code and text that are saved on your device upon accessing certain Websites that use them. Web beacons are also small files saved to your device, often by web analytics software to track visitor information. Cookies and web beacons allow the Firm to conduct Website traffic analysis to better understand the Website's visitors, and while they contain information unique to your device and browser, they do not provide any Personally Identifiable Information.

The Firm may contract with third-party service providers to better understand the Firm's Website visitors. These third parties may also use cookies and other identifiers to collect Non-Personal Data, such as your gender, age, industry, interests, etc., but the Firm does not control how third parties use these technologies.

Acceptance of these anonymous identifiers is not required for site functionality. You may adjust your browser settings or use other means to prevent cookies from being placed on your device, but doing so may result in reduced functionality and a less personalized browsing experience for you the user.

The Firm does not sell any data it collects to third-party services.

The Firm uses a tool called "HubSpot" for a number of marketing-related purposes including, but not limited to, sending emails, tracking website traffic and activity through cookies, offering content through our blog, contact forms, and other webpages. [HubSpot's Privacy Policy](#) explains how this data is collected and used.

The Firm uses a tool called "Google Analytics" to collect information about use of this Website. Google may use and share information collected about you in accordance with the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). The Firm Website may also use Google Display Advertising to aggregate additional information about visitors to enhance their browsing experience. This may include the use of one or more of the following: Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, or Google Analytics Demographics and Interest Reporting. The Firm's use of these products, if any, is in accordance with [Google's Policy Requirements for Display Advertising](#). The Firm will not merge Personally Identifiable Information with Non-Personal Data without your prior affirmative (*i.e.*, opt-in) consent to that merger. You can prevent Google Analytics from recognizing you on return visits by disabling cookies or by [opting out](#) of Google Analytics.

The Firm may also attempt to reach you by providing a custom advertisement based on the sections of our website that you had visited. These remarketing services are provided through advertising websites including but not limited to Google, Facebook and Twitter. These advertising services such as Google AdWords use cookies placed on your computer to show you our advertisements when you visit other websites that participate in the Google Display Network. You may opt out of cookies by adjusting your browser settings or you may use other means to

prevent cookies from being placed on your device. You may opt out of Google's use of cookies by visiting their [Ad Settings page](#). You may also opt out of a third-party vendor's use of cookies at the [Network Advertising Initiative opt-out page](#).

The Firm may also advertise on other social media websites such as Facebook, Twitter, LinkedIn, or Pinterest. Some advertisements may include a form where you may submit personal information, such as your name and email address. Any paid advertisement by the Firm will be in accordance with the respective websites' advertising guidelines and privacy policy. For more information, please see the following links: [Facebook's Data and Privacy Policy](#), [Twitter's Privacy Policy](#), LinkedIn's [Privacy Policy](#) and [Cookie Policy](#), and [Pinterest's Privacy Policy](#).

Personally Identifiable Information

We may collect information that identifies you ("Personally Identifiable Information") when you interact and voluntarily provide such information. Personally Identifiable Information is data that allows you to be identified as a particular person, such as your name, address, or phone number.

The type of Personally Identifiable Information collected on the Website may include:

- Your name;
- Your contact information (e.g., address, phone number, and e-mail address); and
- Any other information you choose to provide the Firm.

Except as described in this Privacy Policy, the Firm does not automatically collect Personally Identifiable Information about you, and does not collect such information without your consent.

Use of Information

The Firm will not use or disclose to any third parties the information it collects from this Website, except as provided by this Privacy Policy.

Non-Personal Data

The Firm uses Non-Personal Data in ways including, but not limited to:

- Improving the usability and design of the Website;
- Evaluating and improving the content of the Website;
- Diagnosing problems with the Website; and
- Assessing the interests and demands of visitors to the Website.

We may share your Non-Personal Data with third parties or permit third parties to place cookies, tags, web beacons, and other anonymous identifiers to collect additional Non-Personal Data when you browse the Website. We or other third parties may use the collected Non-Personal Data to serve advertisements and targeted advertisements to you before, during, and after your visit to the Website.

Personally Identifiable Information

Once collected, the Firm may use your Personally Identifiable Information in a variety of ways including, but not limited to:

- Answering your emails or online requests;
- Delivering and processing surveys and newsletters;
- Personalizing and improving the usability of the Website;
- Fulfilling and/or delivering products and services requested by you; and
- Keeping you informed about events.

The Firm will not share your Personally Identifiable Information with third parties except where:

- You have given your express consent to share the information with third parties;
- The Firm, in its good-faith judgment, determines it needs to provide your information to a third party in order to deliver services you requested; or
- Disclosure is required by law or to protect the rights, property, or personal safety of personnel of the Firm, or members of the general public.

Opting Out

Visitors who wish to opt out of marketing communications may do so using by using the link provided at the bottom of any email sent through HubSpot by the Firm.

You may also block or disable cookies on your device, thereby restricting the collection of Non-Personal Data enabled through the use of cookies. Using [Google Ads Settings](#), you can opt out of Google Analytics for Display Advertising and customize Google Display Network ads. For more information about opting out of Google Analytics tracking, you may visit Google Analytics' [currently available opt-outs](#).

Although our website uses the secure HTTPS protocol, this does not guarantee the transmission is secure, especially if sent when using a public wireless network. Please do not send information by email or through the website that is confidential.

Revised 2/2018

FACTS **WHAT DOES THE DARROW COMPANY, INC.. DO WITH YOUR FINANCIAL 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? The types of personal information we collect and share depends on the product or service you have with us. This information can include:

- Social Security number and income
- Account balances and assets
- Date of Birth
- Transaction history
- Account Numbers

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 The Darrow Company, Inc. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does The Darrow Company, Inc. 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	No	Not Applicable
For our affiliates’ everyday business purposes – information about your transactions and experiences	No	Not Applicable
For our affiliates’ everyday business purposes – information about your creditworthiness	No	Not Applicable
For our affiliates to market to you	No	Not Applicable
For nonaffiliates to market to you	No	Not Applicable

Questions? Call (978) 369-5144 or go to www.darrowwealthmanagement.com

Who we are

Who is providing this notice?	The Darrow Company, Inc.
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What we do

How does The Darrow Company, Inc. 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 building.
How does The Darrow Company, Inc. collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> ▪ Open an account ▪ Deposit money ▪ Seek advice about your investments ▪ Enter into an investment advisory contract ▪ Tell us about your investment or retirement portfolio or earnings <p>We also collect your personal information from other companies.</p>

Definitions

Affiliates	<p>Companies related by common ownership and control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>We do not share with our affiliates.</i>
Nonaffiliates	<p>Companies not related by common ownership and control. They can be financial or nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>We do not share with nonaffiliates so that they can market to you.</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or service to you.</p> <ul style="list-style-type: none"> ▪ <i>We do not jointly market.</i>

Other important information