

Financial Engines Privacy Policy

Effective October 15, 2015

We believe that the privacy and security of your data are essential. This statement summarizes Financial Engines' policies and procedures to protect the privacy and security of the personal information you entrust to us.

What personal information is collected?

The types of personal information that we collect, or are collected on our behalf, depend on your interactions with us, the service(s) available to you and/or the service(s) you have with us. This information may include:

- Information that you provide, such as your name, age, salary, investment holdings and preferences, contact information and your credit card and billing information;
- Information about your use of our services, such as records of the advice that we provide to you and your communications to us about our services;
- Information about your transactions with third parties, such as changes to investment holdings and contribution rates; and
- Information from third parties (*e.g.*, your retirement plan sponsor or administrator or other financial institution that makes our service available to you), such as your financial account information including financial institution, account balances and contributions, name, age, salary, contact information and investment holdings.

As described below, in limited circumstances, we may share any personal information that we have about you with nonaffiliated third parties.

We collect data in our log files. This data may include your IP address, browser type, domain name, the length of time of your visit, and the number of times you visit. We use this information to gather information that helps us to provide you with services and information that are relevant to you.

How is my information used?

Your personal, investment and forecast information are used by Financial Engines to provide you with services, including information about new features or services from Financial Engines you may be interested in, and to fulfill our legal and regulatory requirements. By having more information about you, we are better able to customize our services to your particular situation.

Data that does not include personally identifiable information may be used for academic research or other research purposes. For instance, we may compile data, excluding personally identifiable information, for purposes of demographic analysis and research.

Also, if you choose to participate in voluntary surveys, webinars or user research which you may receive from time to time, any information you provide will be handled in the manner specified.

How is my information protected?

We follow specific policies and procedures to maintain the confidentiality of your personal information. We maintain physical, electronic and procedural safeguards to protect your information. We also restrict access to your personal information to those of our employees with a business need to know such information.

With whom is my information shared?

Financial Engines will not sell, reveal or share any of your personally identifiable information to others except in the following limited circumstances:

- We have your permission to share the information;
- We need to share your information with companies who work on our behalf to provide a product or service to you or to maintain or service your account (for example with a financial institution to execute transactions, or with a mailing service company to send communications to you; unless we tell you differently, these companies do not have any right to use the personally identifiable information we provide to them beyond what is necessary to assist us); or
- We are required or authorized by law to disclose your information (for example, to comply with a subpoena or regulatory requirement, or to protect against fraud or illegal activity).

When you are no longer our customer, we may continue to share your personal information as described in this section.

What are cookies and how are they used?

Cookies are small amounts of data that are sent to your browser from a Web server and stored on your computer's local storage. Our cookies do not contain any personally identifying information. The information they provide may be used for aggregate statistics. They may be used to determine audience size, measure traffic patterns, analyze clickstreams, or help keep your session secure. If you do not wish to receive cookies, most Internet browsers allow you to turn cookies off so that you do not receive them. If you do turn your cookies off, you will not be able to use some services or features.

What choices are available to me regarding use of my information?

On occasion, we may use your e-mail address to inform you of products or services that we believe may be of interest to you. If you do not wish to receive future communications from us, you may update your communications preferences in the Online Advice service. You can also contact Financial Engines Investor Support at support@financialengines.com, and we will remove you from our e-mail list. However, even if you do choose not to receive e-mails from us,

we may be required to send emails when necessary to comply with our legal and regulatory obligations.

How can I change my personal information?

You can change your personal information by logging into the Financial Engines Online Advice service. If you have any questions, please email Financial Engines Investor Support at: support@financialengines.com.

How will you notify me of changes in the use of my personally identifiable information?

If we are going to use your personally identifiable information in a manner different from that stated at the time the information was collected, we will notify you via e-mail, and you will have a choice as to whether or not we use your information in this way. In addition, if we make any material changes in our privacy practices that do not affect information we have already collected, we will post a prominent notice on our Web site notifying you of the change. In some cases we will also notify you by e-mail of certain changes in our privacy practices.

We will rely on the contact information that you, your plan sponsor or your plan administrator provides to communicate any notices to you regarding data in your account.

Any more questions? Contact us...

You can reach Financial Engines in the following ways:

E-mail: support@financialengines.com

Mail: 1050 Enterprise Way, 3rd Floor, Sunnyvale, CA 94089

Phone: (888) 443-8577

This privacy statement applies to individuals who are current, former, and prospective customers. In this privacy statement, “Financial Engines” means Financial Engines, Inc. and its subsidiary, Financial Engines Advisors LLC. Our site links to other Web sites. Financial Engines is not responsible for the privacy practices or content of these other Web sites.