

Fundment

Privacy Policy



Contents

Fundment LLC uses data, including Personal Information, to provide and improve our products, platform, and digital experiences. This Privacy Policy is designed to help you understand how we collect information about you (your “Personal Information”), how we use it, how we share it, and how you can exercise your privacy rights with respect to that information.

To submit a privacy rights request, contact us using one of the methods listed in the “How to Contact Us” section below.

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1.0	Who We Are and What This Policy Covers	01
2.0	Information We Collect	01
3.0	How We Use Your Information	02
4.0	How We Share Your Information	03
5.0	Our Federal Privacy Notice (Regulation S-P)	04
6.0	How We Protect Your Information	04
7.0	Cookies and Online Tracking	05
8.0	Additional Disclosures for California Residents	05
9.0	Your U.S. State Privacy Rights	09
10.0	Exercising Your Privacy Rights	10
11.0	International Transfers	11
12.0	Data Retention	11
13.0	Children	12
14.0	Third-Party Links	12
15.0	Changes to This Policy	12
16.0	How to Contact Us	13
17.0	Annex A – Consumer Privacy Notice (SEC Model Form)	14

1. Who we are and what this policy covers

Fundment LLC (“Fundment,” “we,” “us,” or “our”), CRD#333140, is a broker-dealer registered with the United States Securities and Exchange Commission (“SEC”) and a member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). Fundment provides self-clearing custody, clearing, and execution services for registered investment advisers and their clients. Fundment is part of the Fundment Group, under parent company Fundment Holdings Limited.

This Privacy Policy (“Policy”) describes how Fundment collects, uses, discloses, and otherwise processes your Personal Information when you use our platform and services, visit our websites, or otherwise interact with us in the United States. It includes the privacy notice required by SEC Regulation S-P, our cookie and online tracking practices, and the privacy rights available to you under applicable United States federal and state law, including the California Consumer Privacy Act as amended.

For purposes of this Policy, Fundment is the “controller” (or equivalent term under applicable law) of Personal Information processed in connection with our services. We may engage vendors and service providers that process Personal Information on our behalf as “processors” or “service providers.”

“Personal Information” generally means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to a particular individual or household. Personal Information does not include publicly available information or information that is deidentified or aggregated consistent with applicable privacy laws.

This Policy does not apply to (a) workforce member information (including information about job applicants, employees, and contractors collected in an employment context), or (b) information collected by third parties on their own websites or services, even if those third parties are linked from or integrated with our services. We encourage you to review the privacy policies of any third party you interact with.

2. Information We Collect

We collect a variety of Personal Information in connection with offering our services. Depending on how you interact with our platform and services, we may collect the following categories of Personal Information about you:

- Identifiers: name, residential address, email address, telephone number, date of birth, Social

Security number or taxpayer identification number, and government-issued identity documents collected to verify your identity as required by federal law.

- Financial Information: bank account details, source of funds, income and net-worth information, investment objectives and risk profile, account balances, holdings, and transaction history.
- Documents You Provide: for example, bank statements, identity documents, and transfer paperwork.
- Communications Data: recorded calls, chats, emails, and other support interactions with us.
- • Internet or Other Electronic Network Activity Information: device identifiers, IP address, browser type, log-in records, pages viewed, actions taken on the platform, and geolocation information derived from your device or IP address, collected through cookies and similar technologies described in our Cookie Policy .
- Information from Third Parties: identity-verification and fraud-prevention services, credit reporting agencies where permitted, your financial adviser or their firm, custodians, banks, and transfer counterparties.
- Inferences: preferences, service usage patterns, and similar inferences we derive from the information above to operate and improve our services.

How We Collect Personal Information

We collect the Personal Information described above from the following sources:

- Directly from you when you open an account, complete forms, communicate with us, or otherwise provide information to us;
- From your financial adviser, introducing firm, or their firm;
- From custodians, banks, and transfer counterparties;
- From identity-verification, fraud-prevention, and sanctions-screening providers;
- From public sources and databases; and
- Automatically through your interactions with our website and platform, including through cookies and similar technologies.

3. How We Use Your Information

We use the information we collect about you, or that you provide to us, including Personal Information, for the following purposes:

- **Providing services to you:** To open, administer, and service your account, execute and settle transactions, and provide statements and confirmations.
- **Compliance and legal:** To verify your identity and comply with our legal obligations, including the Bank Secrecy Act customer identification program (CIP), anti-money-laundering (AML) rules, tax reporting, and SEC and FINRA books-and-records requirements.
- **Security:** To detect and prevent fraud and identity theft, including the monitoring described in our identity-theft prevention program adopted under SEC Regulation S-ID.
- **Research and analytics:** To operate, secure, and improve our platform and websites, including through analysis of usage patterns.
- **Communications:** To communicate with you about your account and, where permitted and subject to your choices, about products and services.

4. How We Share Your Information

We do not sell Personal Information for monetary or other valuable consideration, and we do not share it with non-affiliated third parties for their own marketing purposes. We may disclose your Personal Information to persons and entities that help us operate our services, as required by law, and as otherwise described in this Policy. We disclose Personal Information to the following categories of recipients where permitted by law:

- **Transaction parties:** As necessary to effect, administer, or enforce transactions you request, for example with DTCC, banks, and transfer agents;
- **Service providers:** To service providers that perform functions on our behalf under contracts that require them to safeguard the information and to notify us of any breach of security resulting in unauthorized access to customer information as soon as possible and in any event within 72 hours;
- **Your financial adviser:** With your financial adviser and their firm, at your direction;
- **Government authorities:** With regulators, self-regulatory organizations, law enforcement, and courts where required or permitted by law;
- **Affiliates:** Within the Fundment group for the purposes described in this Policy, subject to the

safeguards in Section 11;

- Regulation S-P permitted disclosures: As otherwise permitted by the exceptions in Regulation S-P (17 CFR 248.13, 248.14, and 248.15);
- Professional advisors: To lawyers, accountants, insurers, and information security and forensics experts; and
- Corporate transactions: To potential or actual acquirers or investors and their professional advisors in connection with any actual or proposed merger, acquisition, financing, reorganization, bankruptcy, receivership, dissolution, or similar transaction or proceeding involving all or any part of our business or assets.

Because we share non-public personal information only as described above, federal law does not require us to offer an opt-out. If our practices change, we will provide a revised notice and any opt-out required before the change takes effect.

5. Our Federal Privacy Notice (Regulation S-P)

Regulation S-P requires us to give customers an initial notice of our privacy practices when the relationship is established and to keep it current. Annex A contains our standing consumer privacy notice in the format of the SEC model form. We will deliver it at account opening, make the current version available at all times on our website, and redeliver it if our practices change in a way that requires notice.

6. How We Protect Your Information

The security of your information is important to us. We maintain written policies and procedures that address administrative, technical, and physical safeguards for customer information and customer records, designed to ensure their security and confidentiality, protect against anticipated threats or hazards, and protect against unauthorized access or use that could result in substantial harm or inconvenience to any customer. We have implemented reasonable security measures including encryption of data at rest and in transit, multi-factor authentication (MFA), least-privilege access controls, security monitoring and threat detection capabilities, endpoint detection and response (EDR) tooling, periodic independent security testing, and a documented secure disposal standard for customer information.

We limit access to your Personal Information to those who have a business need for such access. No method of electronic storage or transmission over the Internet is completely secure. While we strive to use commercially reasonable means to protect your information, we cannot guarantee

absolute security.

Incident Response and Notification

We maintain a written incident response program designed to detect, respond to, and recover from unauthorized access to or use of customer information, including procedures to assess the nature and scope of an incident, to contain and control it, and to notify affected individuals. Unless we determine, after a reasonable investigation, that sensitive customer information has not been, and is not reasonably likely to be, used in a manner that would result in substantial harm or inconvenience, we will notify affected individuals as soon as practicable and not later than 30 days after becoming aware that unauthorized access to or use of customer information has occurred or is reasonably likely to have occurred. Notices will describe the incident, the information involved, and steps you can take to protect yourself.

7. Cookies and Online Tracking

When you interact with our website and platform, we may use cookies and similar technologies to automatically collect information about you. Cookies are small text files placed on your device that help us provide, secure, and improve our services. For more information about what cookies and similar technologies are, why we may use them, and the choices you may have regarding their use, please see our [Cookie Policy](#).

8. Additional Disclosures for California Residents

This section provides additional information for California residents pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”). This section, together with the rest of this Policy, is intended to satisfy all disclosure obligations under the CCPA, including the requirements for a Notice at Collection.

Much of the information we process is collected subject to federal financial privacy law (the Gramm-Leach-Bliley Act and Regulation S-P) and is exempt from the CCPA; CCPA rights apply mainly to information collected outside the customer relationship, for example through our marketing website.

Categories of Personal Information Collected, Sources, and Purposes

The Personal Information we collect about you includes information within the categories listed in the table below. Note that the “category” of data listed below refers to the category of Personal Information as defined under the CCPA. Inclusion of a category in the table below indicates only that we may collect some information within that category. We do not necessarily collect all information

listed in a particular category, nor do we necessarily collect all categories of information for all individuals. For each category, the table also describes the sources from which we collect such information, the business or commercial purposes for which we collect such information, and the categories of third parties to whom we disclose such information. We have disclosed Personal Information in each of the categories listed below to our affiliates and subsidiaries, service providers, and other third parties, as well as to government entities where required, for business purposes within the past 12 months.

Category of personal information	Sources	Purposes	Disclosed to
Identifiers, such as name, postal address, email address, telephone number, date of birth, Social Security number or taxpayer identification number, government-issued identity documents, username, and online identifiers such as IP address and device identifiers.	Directly from you; your financial adviser or discretionary investment manager; identity verification and fraud prevention service providers; custodians, banks, and transfer counterparties; automatically through your interactions with our website and platform.	To open, administer, and service your account; to verify your identity and comply with legal obligations; to process transactions; to communicate with you; to improve and secure our services.	Affiliates and subsidiaries; service providers (including identity verification providers, hosting providers, and IT service providers); clearing firms, custodians, and transfer agents; professional advisers; government regulators and law enforcement.
Financial Information, such as bank account details, source of funds, income and net-worth information, investment objectives and risk profile, account balances, holdings, and transaction history.	Directly from you; your financial adviser or discretionary investment manager; custodians, banks, and transfer counterparties; credit reference agencies where permitted.	To open, administer, and service your account; to execute and settle transactions; to process payments; to provide statements and confirmations; to comply with legal and regulatory obligations.	Affiliates and subsidiaries; service providers; clearing firms, custodians, brokers, and transfer agents; your financial adviser or discretionary investment manager; professional advisers; government regulators and law enforcement.

Category of personal information	Sources	Purposes	Disclosed to
Commercial Information, such as records of products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies.	Directly from you; automatically through your interactions with our website and platform.	To provide and improve our services; to manage our relationship with you; for internal research and analytics.	Affiliates and subsidiaries; service providers.
Internet or Other Electronic Network Activity Information, such as browsing history, search history, device identifiers, IP address, browser type, log-in records, pages viewed, actions taken on the platform, and information regarding your interaction with our website or platform.	Automatically through your interactions with our website and platform, including through cookies and similar technologies.	To improve, administer, and secure our website and platform; for troubleshooting, data analysis, and system testing; to detect and prevent fraud and security incidents; for internal research and analytics.	Affiliates and subsidiaries; service providers (including analytics providers, hosting providers, and security service providers).
Geolocation Data, such as approximate location derived from your device or IP address.	Automatically through your interactions with our website and platform.	To provide and improve our services; to detect and prevent fraud and security incidents.	Affiliates and subsidiaries; service providers (including analytics and security service providers).
Audio, Electronic, Visual, or Similar Information, such as recorded calls and other support interactions with us.	Directly from you when you contact us for customer support.	To provide customer support; for recordkeeping and compliance; to improve our services.	Affiliates and subsidiaries; service providers; government regulators where required.

Category of personal information	Sources	Purposes	Disclosed to
Professional or Employment-Related Information, such as information about your employer provided in connection with employer-sponsored accounts.	Directly from you; your employer.	To open, administer, and service your account; to verify eligibility for employer-sponsored programs.	Affiliates and subsidiaries; service providers; your employer (for employer-sponsored accounts); pension providers.
Inferences drawn from the above categories of Personal Information to create a profile reflecting your preferences, characteristics, and behavior, such as service usage patterns and similar inferences we derive to operate and improve our services.	Derived from the categories of Personal Information described above.	To provide and improve our services; for internal research and analytics.	Affiliates and subsidiaries; service providers.

Sale and Sharing of Personal Information for Purposes of Cross-Context Behavioral Advertising

We do not “sell” your Personal Information for monetary or other valuable consideration as those terms are defined under the CCPA. We also do not “share” your Personal Information for cross-context behavioral advertising purposes. Cross-context behavioral advertising is advertising customized based on predictions generated over time from your visits across different websites, devices, and mobile applications. We do not currently deploy cookies or similar technologies on our website that would constitute a sale or sharing of Personal Information under applicable U.S. state privacy laws.

In the preceding 12 months, we have not sold or shared Personal Information for purposes of cross-context behavioral advertising. For information on cookies and similar technologies and how to modify your cookie settings, please see our Cookie Policy.

Categories of Third Parties to Whom Personal Information Is Disclosed

In the preceding 12 months, we have disclosed Personal Information to the following categories of third parties for business purposes: affiliates and subsidiaries (Fundment Holdings Limited and Fundment Limited); clearing firms, custodians, and transfer agents; service providers (including hosting providers, analytics providers, identity-verification providers, and marketing vendors); professional advisors (lawyers, accountants, insurers); advertising and marketing partners; and government regulators and law enforcement.

We do not use or disclose sensitive personal information for purposes that would require us to offer you the right to limit such use.

9. Your U.S. State Privacy Rights

Depending on the laws in your state of residence (including the CCPA and comparable laws in states such as Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, and Virginia), you may have some or all of the rights listed below with respect to your Personal Information, subject to certain exemptions provided by law. Even if we are not legally required to do so, we may choose to extend these rights to you.

Right to Know/Access. You may have the right to know and request information about the categories and specific pieces of Personal Information we have collected about you, the categories of sources from which such information is collected, the business or commercial purpose for collecting or sharing such information, and the categories of third parties to whom we disclose such information. You may also have the right to know if we have sold or shared your Personal Information, the categories of Personal Information sold or shared, and the categories of third parties to whom such Personal Information was sold or shared.

Right to Delete. You may have the right to request the deletion of your Personal Information, subject to certain exceptions. We will not delete Personal Information when retention is required to fulfill a legal obligation, is necessary to exercise or defend legal claims, when we are required or permitted to retain the Personal Information by law (including SEC and FINRA books-and-records requirements and anti-money-laundering rules), or when an exception under applicable privacy law applies.

Right to Correct. You may have the right to request correction of inaccurate Personal Information we maintain about you, taking into account the nature of the Personal Information and the purposes of our processing. We may decline a correction request if we believe the existing information is accurate or if we are unable to verify the accuracy of the information you provide.

Right to Opt-Out of the Sale or Sharing of Personal Information. You have the right to opt out of the “sale” of your Personal Information and the “sharing” of your Personal Information for cross-context

behavioral advertising. We will honor opt-out preference signals, including Global Privacy Control (GPC), as valid requests to opt out where required by applicable law. As described above, we do not currently sell or share your Personal Information for these purposes. If our practices change in the future, we will update this Policy and provide you with an opportunity to opt out.

Right to Limit Use and Disclosure of Sensitive Personal Information. Certain state privacy laws, including the CCPA, provide the right to limit the use and disclosure of sensitive personal information for purposes other than those permitted without requiring an opt-out. We do not intentionally collect sensitive personal information through our website. To the extent we collect sensitive personal information (such as Social Security numbers, which are necessary for account opening and tax reporting), we use it only for purposes permitted under the CCPA without requiring an opt-out, including to provide our services, to detect security incidents, and to comply with our legal obligations.

Sensitive Personal Information. We collect certain categories of information that qualify as sensitive personal information under the CCPA, including Social Security numbers, government identification numbers, and financial account information. We use and disclose sensitive personal information only for purposes permitted under Cal. Civ. Code § 1798.121(a), including: (1) to perform services or provide goods reasonably expected by an average consumer; (2) to detect security incidents and resist malicious, deceptive, or illegal actions; (3) to ensure the physical safety of individuals; (4) for short-term transient use; (5) to perform services on behalf of the business; (6) to verify or maintain the quality or safety of services; and (7) for purposes authorized by regulations. We do not use or disclose sensitive personal information for purposes that would require us to offer you the right to limit such use.

Right to Non-Discrimination. You have the right not to be discriminated against or retaliated against for exercising any of your privacy rights described in this Policy.

Right to Data Portability. You may have the right to obtain Personal Information about you in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the information to another entity without hindrance.

Right to Opt-Out of Automated Decision-Making/Profiling. Certain state privacy laws provide the right to opt out of profiling in furtherance of decisions that produce legal or similarly significant effects. We do not currently engage in such profiling. If we begin to do so in the future, we will update this Policy and provide you with the ability to opt out.

Right to Appeal. Depending on your jurisdiction, you may have the right to appeal our decision regarding a privacy rights request. Please contact us using the methods listed in the “How to Contact Us” section below.

10. Exercising Your Privacy Rights

If you would like to exercise any of the privacy rights outlined above, please contact us using one of the methods listed below:

Online: **Submit request here** If this link does not work, you may submit your request by email to legal@fundment.com with a copy to marketing@fundment.com.

Postal: Suite 1140, 1270 Avenue of the Americas, New York, NY 10111

Authorized Agents. You may designate an authorized agent to make a request on your behalf. If you are submitting a request through an authorized agent, the authorized agent must provide us with your signed written permission stating that the agent is authorized to make the request on your behalf. Alternatively, your authorized agent may provide evidence of having power of attorney or acting as a conservator for you. We may also request that any authorized agents verify their identity and, where permitted by law, may reach out to you directly to confirm that you have provided the agent with your permission to submit the request on your behalf.

Verification. When you exercise these rights and submit a request to us, we will verify your identity by asking you for information such as your relationship with us, name, email address, and telephone number. We use this verification process to protect your Personal Information from unauthorized access or deletion. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing. We will respond to verifiable consumer requests within the time period required by applicable law, generally within 45 days. If we require additional time, we will inform you of the reason and extension period in writing. If we cannot fulfill your request, we will explain why in our response.

11. International Transfers

Fundment operates from the United States, and our group operates in the United Kingdom. Personal Information may be processed by group entities and service providers in the United States, the United Kingdom, and the European Union. Wherever it is processed, it is protected by the safeguards described in this Policy and by intra-group agreements incorporating Standard Contractual Clauses approved by the European Commission and the UK Information Commissioner's Office for transfers of personal data. The data protection and privacy laws of the United States may not be as comprehensive as those in your country. By using our services, you acknowledge and consent to the transfer of your information to the United States.

12. Data Retention

Except as otherwise permitted or required by applicable law, we retain Personal Information only for as long as reasonably necessary to fulfill the purposes for which it was collected and to provide our services. We retain Personal Information for as long as needed for the purposes described above and to meet legal obligations, including SEC Rules 17a-3 and 17a-4 books-and-records requirements and anti-money-laundering rules. Retention periods are determined by these and other applicable regulatory requirements, which commonly extend for a period of years following account closure; records are securely deleted or de-identified once those requirements no longer apply.

To determine the appropriate retention period, we consider various criteria, including: (a) whether the Personal Information continues to be necessary to provide our services; (b) our contractual, legal, and regulatory recordkeeping obligations; (c) the amount, nature, and sensitivity of the Personal Information; and (d) the potential risk of harm from unauthorized use or disclosure.

13. Children

Our services are directed at adults and are not intended for children under the age of 18. We do not knowingly collect Personal Information from anyone under 18 years of age, except identifying information for custodial or beneficiary arrangements opened by an adult. If we learn that we have inadvertently collected Personal Information from a child under 18, we will take prompt steps to delete that information consistent with applicable law. If you believe we have collected Personal Information from a child under 18, please contact us immediately using the contact information provided in the “How to Contact Us” section below.

14. Third-Party Links

Our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control third-party websites and are not responsible for their privacy notices or practices. If you submit Personal Information to any third-party websites or service providers, your information is governed by their privacy policies. When you leave our website, we encourage you to read the privacy notice on every website you visit.

15. Changes to This Policy

We reserve the right to change this Policy at any time. If we make changes, we will post the revised Policy on our website and update the “Last updated” date at the top of this Policy. If we make material changes to how we treat your Personal Information, we will notify you by posting a prominent notice on

our website or by other means as required by applicable law. Where required by Regulation S-P or state law, we will deliver a revised notice before the change takes effect. Your continued use of our services after we post a revised Policy constitutes your acceptance of the modified Policy.

16. How to Contact Us

If you have any questions about this Policy, the ways we collect and use your Personal Information, or you would like to exercise your privacy rights, you may contact us at:

Fundment LLC

✉ Email: privacy@fundment.com

☎ Telephone: +1 646 222 8791

🏠 Mailing Address: Suite 1140, 1270 Avenue of the Americas, New York, NY 10111

✉ Data Protection Contact: dpo@fundment.com

🌐 Website: https://fundment.com/en_us

If you have unresolved concerns, you may also contact your state Attorney General or, for California residents, the California Privacy Protection Agency.

Annex A – Consumer Privacy Notice (SEC Model Form)

Facts	What does Fundment LLC do with your personal 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 depend on the product or service you have with us. This information can include: • Social Security number and date of birth; • account balances and transaction or loss history; • account transactions and payment history.
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 Fundment LLC chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does Fundment LLC 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

Reasons we can share your personal information	Does Fundment LLC share?	Can you limit this sharing?
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes - information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes - information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
<u>For nonaffiliates to market to you</u>	No	We don't share

Questions? Call +1 646 222 8791 or visit https://fundment.com/en_us

Who is providing this notice? Fundment LLC

What we do	
How does Fundment LLC 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 buildings. We maintain physical and technical safeguards, including firewalls and other technical controls. Our employees are governed by confidentiality policies requiring confidential treatment of client information.
How does Fundment LLC collect my personal information?	We collect your personal information, for example, when you: • open an account or seek advice about your investments; • make deposits or withdrawals from your account or enter into an investment advisory contract; or • provide account information. We also collect your personal information from other companies.

What we do	
Why can't I limit all sharing?	Federal law gives you the right to limit only: • sharing for affiliates' everyday business purposes—information about your creditworthiness; • affiliates from using your information to market to you; • and sharing for nonaffiliates to market to you. State laws and individual companies may give you additional rights to limit sharing.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account—unless you tell us otherwise.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. • Our affiliates include Fundment Holdings Limited and Fundment Limited (United Kingdom).
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. • Fundment LLC does not share with nonaffiliates so they can market to you.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. • Fundment LLC does not jointly market.