

FINANCIAL ENGINES PRIVACY POLICY

Effective March 31, 2011.

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 of mine is collected?

Financial Engines collects information about you from your Plan sponsor and Provider, which may include but is not limited to your name, age, salary, plan account balances and contributions, and contact information. You may choose to provide us with additional information about you and your investment holdings and preferences. We keep records of our advisory service, including but not limited to transaction orders that we make for your account, your use of the service, and your communications to us about our service.

Who is collecting my information?

Only Financial Engines (which means Financial Engines, Inc. and its subsidiary, Financial Engines Advisors L.L.C.) collects this information unless it is explicitly stated otherwise or as permitted under this policy.

How is my information used?

Your personal and account information are maintained by Financial Engines to provide you with your services and to fulfill our legal and regulatory requirements. By having your personal information, we are better able to customize our services to your particular situation.

Data that does not include personally identifiable information may be used for market 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 respond to voluntary surveys which you may receive from time to time, any information you provide will be used in the manner specified.

How is my information protected?

Our employees are required to follow procedures to maintain the confidentiality of your personal information. We maintain extensive physical, electronic and procedural safeguards to protect your 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 from us 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).

How can I change my personal information?

You can log on to the Professional Management (formerly known as Personal Asset Manager) program member website, or you can call us, toll free, at 1-800-601-5957 for assistance.

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 of collection, we will notify you in writing, 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 notify you in writing.

Any more questions? Contact us...

You can reach Financial Engines in the following ways:

E-mail: Advisor@FinancialEngines.com
Mail: 1804 Embarcadero Road Palo Alto, CA 94303
Phone: 1-800-601-5957

This privacy statement applies to individuals who are current, former, and prospective customers.