

Privacy Policy

Last updated June 26, 2001

Last verified February 9, 2008

We will not sell, reveal or share your personal information.

As a financial services company, we believe that the privacy and security of your data are essential. Personal information you give us is handled with care.

Why is Financial Engines safe?

- **Personal information:** We will not sell, reveal or share your personal information to third parties, except with your permission or as authorized by law.
- **Independent advice:** Financial Engines is an independent investment advisor. We do not sell mutual funds or receive commissions from any of the funds we recommend. As a fee-based advisor, our primary revenue comes from the fees we charge customers, their employers or financial service firms for the advice portion of our service.
- **Secure technology:** We use SSL encryption, which is the industry standard for secure data transfer software, to ensure data you transmit through the Internet is protected against unauthorized access.

Financial Engines privacy statement

Financial Engines, Inc. is a licensee of the TRUSTe Privacy Program. TRUSTe is an independent, non-profit organization whose mission is to build users' trust and confidence in the Internet by promoting the use of fair information practices. This privacy policy covers the website <http://www.financialengines.com>. To demonstrate our commitment to your privacy, we have agreed to disclose our information practices and have our privacy practices reviewed for compliance by TRUSTe. By displaying the TRUSTe trustmark, we have agreed to notify you of ¹:

- What personally identifiable information of mine is collected?
- Who is collecting my information?
- How is my information used?
- With whom is my information shared?
- What are cookies and how are they used?
- What choices are available to me regarding collection, use and distribution of my information?
- How can I change my personal information?
- How will you notify me of changes in the use of my personal information?

If you have questions or concerns regarding this statement, you should first e-mail Customer Support at support@financialengines.com. If you do not receive

acknowledgment of your inquiry or your inquiry has not been satisfactorily addressed, you should then contact TRUSTe at http://www.truste.org/consumers/watchdog_complaint.php. TRUSTe will then serve as a liaison with Financial Engines to resolve your concerns.

This privacy statement also applies to our former customers.

What personally identifiable information of mine is collected?

Financial Engines collects information from you upon registration. At this point, you provide us with your name, zip code and e-mail address. Depending on your access to Financial Engines, you may be asked to provide us with additional information on the name of your company and a temporary identification number that identifies you as an employee of a company that participates in our corporate program. Upon successful completion of registration, you are taken to the service where you will enter information about your gender, annual income, state of residence, marital status and your individual financial accounts. If you indicate you have a spouse or partner, his/her personal and financial account information will also be requested. If you receive advice, we keep a log of the advice that we provide to you in our records for your protection. We are required by law to keep records of your usage of our advisory service. This enables us to provide you with a history of the advice we have given to you.

If your access allows you to purchase a subscription, we ask for your credit card and billing information. Billing information is used to verify your credit card information. We use VeriSign to bill your credit card for the Advice portion of the service you requested. VeriSign is a well-known company that specializes in secure, online credit card processing.

If you subscribe to our service, you also have the option to link an outside financial account to your Financial Engines account. This feature allows you to import your investment information from a financial service provider instead of having to manually enter this information. If you choose to use this feature, you will provide the account information, such as account number, username, password and other login information in order to link your account to Financial Engines.

For some users, forms such as the Customer Support form and Forgot Password or User ID form, are available. These forms ask for some personal information, such as your name and birth date. This information is necessary and used only to provide the service you are requesting from those forms.

Occasionally, we may also conduct optional surveys through our monthly e-mail newsletters. In this case, we would collect the information you provide us from answering the survey questions.

Furthermore, we collect data in our log files. We collect your IP address, browser type and domain name, and we log the length of time of your visit and the number of times you visit and subscribe to our service. We use this information to gather aggregate demographic information that helps us to provide you with services and information that are relevant to you. We keep this information for our internal use; we do not share it with others.

If your retirement plan sponsor or administrator or other financial institution makes our service available to you, it may provide us with information about you and your account to reduce the amount of data you need to enter.

Who is collecting my information?

When you are on the Financial Engines site and provide us with your personal information, you can be sure that 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.

How is my information used?

Your personal, investment and forecast information are maintained by Financial Engines to provide you with the services you have requested and to fulfill our legal and regulatory requirements. Financial Engines' primary goal is to offer you a private, customized experience on our Web site. This includes personalized portfolio tracking, forecasting of your current holdings and, if your access allows, customized advice on your accounts. By having your personal information, we are better able to assess the chances of your reaching your financial goals. Therefore, we are able to return a more accurate forecast and/or advice to you.

The demographic information we collect is used in aggregated form and not linked to any of your personal information. We use this information for our market research purposes.

With whom is my information shared?

Financial Engines will not sell, reveal or share any of your personal 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 you have requested or to maintain or service your account. For example:
 - We may work with a financial institution, such as your plan administrator or brokerage firm, to make services available to you or effect a transaction you have requested.
 - If you have requested to receive email communications from us, we may provide your e-mail address to companies that perform mailing services for us. (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 or for the safety of customers and their property).
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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 hard drive. Our cookies do not contain any personally identifying information. Instead, the information they provide is in the form of aggregate statistics. They are used by us to determine audience size, measure traffic patterns and analyze clickstreams.

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 still be able to use our whole Web site.

What choices are available to me regarding collection, use and distribution of my information?

At Financial Engines, we would like to give you control over your account 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, in the Online Advice service (previously known as the Personal Online Advisor service), click the "Your Profile " tab and then click "Communications Preferences." In the "E-mail preferences " area, click "Edit." By checking the box under your e-mail address, you will be removed from our mailing list. You can also contact Financial Engines Customer Support at support@financialengines.com, and we will ensure that you do not receive further e-mails from us.

If you are a new user and have not registered with us, you can check the box below the e-mail address field, which indicates you would prefer not to receive e-mails from us.

However, even if you do choose not to receive e-mails from us, we may be required to send you an e-mail in an event where we must comply with our legal and regulatory obligations.

Furthermore, you can change your personal information anytime when you are logged into Financial Engines. For more information on how to change or correct your information, see the next section, "How can I change my personal information?"

How can I change my personal information?

After logging into the Financial Engines Online Advice service, you have the option to change your information under the "Your Profile " tab. For any information you cannot change in that section or if you are having problems changing your information, you can contact Financial Engines Customer Support through e-mail at: support@financialengines.com to correct your information.

How will you notify me of changes in the use of my personal 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 via e-mail. You will have a choice as to whether or not we use your information in this different manner. In addition, if we make any material changes in our privacy practices that do not affect user information already stored in our database, we will post a prominent notice on our Web site notifying users of the change. In some cases where we post the notice we will also e-mail users notifying them of the changes in our privacy practices.

Any more questions? Contact us...

Please feel free to contact Financial Engines if you have further questions about our privacy and security policies, or if you just would like to give us suggestions for improving them. You can reach Financial Engines in the following ways:

E-mail: support@financialengines.com

Mail: 1804 Embarcadero Road Palo Alto, CA 94303

¹ Our site links to other Web sites. Financial Engines is not responsible for the privacy practices or content of these other Web sites.

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