



VIDENT INVESTMENT ADVISORY, LLC

**PRIVACY NOTICE REGARDING CLIENT PRIVACY
AS REQUIRED BY REGULATION S-P**

March 2016

Maintaining the trust and confidence of our clients is a high priority. Therefore, privacy is one of the central tenets of Vident Investment Advisory, LLC's ("VIA") value proposition. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of VIA.

Information We Collect

VIA may collect nonpublic information to process and administer clients' business and to ensure that we are satisfying their financial needs. This includes:

- Information provided to VIA, such as on applications, questionnaires, contracts, or other forms.
- Transactions, account balances, account history, and transactions with us, affiliates or third parties.
- Information provided by clients and their representatives.

Our Security Policy

We restrict access to nonpublic personal information about you to those individuals who need to know that information to perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information. This includes:

- Physical safeguards, including restricted access to our offices.
- Electronic safeguards, including firewalls for server database protection, passwords for computer login for on-site computers, and limited remote access to client information.
- Restricting access to client information to those required to have access in order to service client needs.

Employee Confidentiality

We require all employees to sign a confidentiality agreement which strictly governs their employment status with VIA.

Disclosing Information

We may disclose information that we collect in accordance with this policy. However, we will not disclose information regarding you or your account except as permitted or required by law, or as necessary to provide services to you. We may disclose information regarding you or your account under the following circumstances and only the minimum amount of information will be shared.

- To entities that perform services for us or you, or function on your behalf, including, but not limited to: our affiliates and financial service providers, such as a custodian, broker-dealer, investment company, portfolio manager, portfolio reporting vendor, or insurance company;
- To consumer reporting agencies; and
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity.

We may also share your information as required by law or to comply with regulatory inquiries to government entities or other third parties in response to subpoenas or other legal process.

Closed or Inactive Accounts

If you decide to terminate your relationship with VIA, our Privacy Policy will continue to apply to you.

Complaint Notification

Please direct complaints to: Anne Czizek, Chief Compliance Officer at Vident Investment Advisory, LLC, 300 Colonial Center Pkwy., Suite 330, Roswell, GA 30076. Phone: (404) 487-1961 or compliance@videntinvestmentadvisory.com.

Changes to This Privacy Policy

If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Vident Investment Advisory, LLC, 300 Colonial Center Pkwy., Suite 330, Roswell, GA 30076. Phone: (404) 487-1961 or compliance@videntinvestmentadvisory.com.