HealthEquity | Advisors

Information Security and Privacy Policy

Original effective date:	9/23/2016
Date of last approval:	8/13/2025
Approved by:	Executive Sponsor
Business unit:	HealthEquity Advisors, LLC
Owner:	Executive Sponsor
Executive sponsor:	Chief Compliance Officer

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1 INFORMATION SECURITY POLICY

Pursuant to the intercompany services agreement between *HEA* and *HQY*, all information security functions applicable to *HEA* are performed by *HQY*, who develops the *HQY* Information Security Policy and related standards for data and system protection. Accordingly, *HEA* hereby adopts by reference *HQY's* current Information Security Policy in its entirety and the related standards *HQY* applies across systems and facilities. The *CCO* will make available to all *Team Members* as needed a copy of *HQY's* current Information Security Policy.

2 PRIVACY POLICY

In addition, *HEA* has adopted *HQY's* Privacy Policy in its entirety and the related standards *HQY* applies across systems and facilities. The *CCO* will make available to all Team Members as needed a copy of *HQY's* current Privacy Policy.

3 PRIVACY NOTICE

HQY's affiliates, including *HEA*, are included in *HQY*'s privacy notice. In fulfilling *HEA*'s obligations under Regulation S-P: (1) *HQY* provides each member with a copy of *HQY*'s Privacy Notice not later than at the time the member's HSA account is opened, and (2) if required by Regulation S-P, provide the Privacy Notice annually to each individual Client, in each case via the *HQY*'s website at https://www.healthequity.com/privacy/hsa.[1]

4 SAFEGUARDS RULE AND BREACH NOTIFICATION

Under Regulation S-P, HEA is required to adopt written policies and procedures covering safeguards that protect consumer records and information. HEA is included in the scope of HQY's Privacy Event Response Plan, Privacy Standard - Inquiry Complaint Incident Breach, and Third-Party (3P) Risk Management Program.

HEA will coordinate with *HQY* to retain appropriate written records, including documentation of unauthorized use of *HEA* customer information, investigation and determination regarding notification to affected individuals, and copies of notices provided.

5 LIMITATIONS ON MARKETING BY AFFILIATES

Under Regulation S-AM, Investment Advisers are restricted from using eligibility information (i.e., certain financial information regarding the consumer's transactions or experiences with the covered person) received from an affiliate to solicit consumer unless certain conditions are met. HEA does not solicit consumers based on information received from affiliates and does not provide eligibility information to affiliates for marketing purposes.

[1] See also, Privacy Standard - GLBA Nonpublic Personal Information (NPI) (esp. footnote 11 and related text).

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6 OVERSIGHT

The *CCO* will review the scope of *HQY's* Information Security Policy and Privacy Policy, and related standards, at least annually to assess its continued effectiveness in supporting *HEA's* responsibilities.

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