



Privacy Policy for Website and Website Services

Last Updated: *January 2026*

This Privacy Policy describes how **New Frontier Advisors LLC** (“**New Frontier**,” “**we**,” “**us**,” or “**our**”) collects, uses, discloses, and protects information obtained from **financial advisors, advisory firms, and other professional Users** (collectively, “**Users**,” “**you**,” or “**your**”) when you access or use our Web Site or the Services, as those terms are defined in the [Terms of Use](#).

This Privacy Policy is incorporated into and forms part of the Terms of Use. By accessing the Web Site or using the Services, you agree to the Terms of Use and this Privacy Policy. If you do not agree, you must discontinue using the Web Site and the Services.

New Frontier does **not** market its technology or advisory capabilities to retail clients or consumers. Our Services are designed for and made available solely to **professional financial advisors and advisory firms** acting in a business capacity.

1. Information We Collect

New Frontier collects information only from **professional Users** and, when applicable, from third-party systems or custodians connected by those Users.

A. Information You Provide as a Professional User

We may collect information you submit or otherwise provide, including:

- Contact and business information (name, firm name, business email, telephone number, title/role).
- Professional account registration details and credentials.
- Information transmitted through the Web Site, including communications sent using email links, portals, or other collaboration features.
- Information or analysis you upload to or process through the Services.
- Billing or payment-related information handled by a secure third-party processor.

Because the Services are designed for regulated financial professionals, most information we collect relates to your **business activities**, not personal consumer use.

B. Information Automatically Collected

We automatically collect:

- IP address, device identifiers, and browser information
- Access times and usage logs
- Feature usage and system interaction data
- Cookies and similar technologies

These data help maintain system integrity, security, and proper functioning for business users.

C. Information Provided Through Integrations

At your direction, we may receive:

- Custodial or account-level feeds
- Portfolio and market data
- CRM or portfolio management system data
- Other business information that you or your firm authorize for use with the Services

All such data is processed as **advisor-directed business information**, not as consumer personal information.

2. RIA Client Information Provided by Advisors

New Frontier does not provide services directly to retail clients and does not solicit personal information from retail clients. However, financial advisors may upload, transmit, or integrate information about their own clients ("**End-Client Data**") in order to use our analytical tools or software features.

For such End-Client Data:

- You, the financial advisor or advisory firm, are the **data controller**.
- New Frontier acts solely as a **service provider / processor**.
- We process End-Client Data only according to your instructions and solely to provide the contracted Services.
- We do not use, share, or analyze End-Client Data for any independent purpose outside the Services.

You are responsible for:

- Obtaining any required permissions or disclosures for your use of End-Client Data
 - Ensuring your use of the Services complies with your regulatory obligations
 - Maintaining compliance with Regulation S-P and similar requirements applicable to your clients
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3. How We Use Information

New Frontier uses information only for professional purposes, including:

A. Providing, Maintaining, and Enhancing the Services

- Account authentication
- Delivery of analytical tools and software functionality
- Supporting advisor workflows and professional operations
- System performance, optimization, and security

B. Communicating with Professional Users

We may contact you for:

- Operational and administrative notices
- Updates relating to service availability, maintenance, or enhancements
- Compliance-related notices, disclosures, or requests
- Responses to inquiries or support needs

C. Business Operations

- Billing and subscription processing
- Internal analytics and product development
- Security monitoring and fraud prevention

D. Legal and Regulatory Compliance

To comply with:

- SEC and state regulatory requirements
 - Recordkeeping obligations
 - Legal processes, examinations, or investigations
 - Information security and incident response requirements
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4. How We Share Information

New Frontier does not sell information and does not share information for advertising or marketing to consumers. New Frontier will adequately safeguard your data, keep it confidential, and will not disclose it to third parties except as necessary to provide the Services or comply with legal obligations.

We may disclose information:

A. To Service Providers

Vetted vendors assisting with:

- Secure data hosting
- Encryption and storage
- Advisor support systems
- System monitoring and infrastructure
- Performance calculation verification
- Payment processing

B. To User-Authorized Integrations

At your firm's direction, information may be shared with:

- Custodians
- Portfolio management systems
- CRM tools
- Advisory-related third-party platforms

C. As Part of Submissions (Per the Terms of Use)

If you voluntarily submit content (including through forums, comments, or uploads), those Submissions may be used or displayed in accordance with the Terms of Use.

D. For Legal, Regulatory, or Compliance Purposes

We may disclose information to:

- The SEC or other regulators
- Law enforcement
- Courts
- Compliance auditors

E. Business Transfers

Information may be transferred to successor entities in a merger or acquisition, subject to confidentiality protections.

5. Security Measures

Consistent with the Security provisions of the Terms of Use:

- We use commercially reasonable technical, administrative, and physical safeguards to protect information.
- These include encryption, access controls, secure infrastructure, and monitoring.

However, we cannot guarantee that unauthorized access or other incidents will never occur.

6. Data Retention

We retain business-user information and End-Client Data only for as long as necessary to:

- Provide the Services
- Comply with regulatory or legal obligations
- Satisfy contractual obligations with advisory firms

Upon account termination, data may be deleted in accordance with our internal policies, the Terms of Use, and applicable law.

7. Cookies and Tracking Technologies

Cookies and similar technologies are used to:

- Support secure login sessions
- Maintain system performance
- Improve functionality for professional users
- Analyze platform usage

Disabling cookies may affect some functionality of the Services.

8. Third-Party Links

Consistent with the Terms of Use:

- We are not responsible for the content or privacy practices of third-party sites.
 - You should review their policies independently.
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9. No Services for Minors or Retail Consumers

The Web Site and Services are for use only by **financial professionals and advisory firms**.

They are not intended for:

- Individual retail clients
 - Consumers acting for personal or household purposes
 - Minors or non-professional users
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10. Cross-Border Transfer

If you access the Services from outside the United States, you consent to the transfer and processing of information in the United States for business purposes.

11. Changes to this Policy

New Frontier may update this Privacy Policy at any time as provided in the Amendment section of the Terms of Use. Changes will be posted with an updated “Last Updated” date.

Your continued use of the Services constitutes acceptance of the updated Privacy Policy.

12. Contact Information

If you have questions about this Privacy Policy or our data practices, please contact:

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