

NOTICE

TO Wealth is committed to protecting the confidentiality of your personal and financial information; we consider it one of our highest responsibilities. The following Privacy Policy outlines our policies and procedures regarding the collection, use, disclosure and safeguarding of nonpublic personal information you provide to us. Our Privacy Policy has been developed based on our current business practices and in accordance with Regulation S-P of the Gramm-Leach-Bliley Act. Notification of changes or updates to our Privacy Policy will be provided as they occur.

Information Practices

Collecting personal and financial information from you is an essential element in helping you achieve your personal, financial, and investment goals. The types of information we collect may include:

- Your name, address, telephone number, email address, birthday, social security number and/or taxpayer ID number;
- Information regarding assets and income, investment accounts, banking accounts and/or past transactions;
- Family members or other important contact persons relevant to you (trustees, personal representatives, etc.).

This information may be collected via information forms, account or service applications, customer surveys or other third-party sources as applicable. Please contact us if you believe our records contain inaccurate, incomplete, or out-of-date information.

Use and Disclosure of Information

In general, we have a “Do Not Share” Privacy Policy, meaning we do not disclose any nonpublic personal information about you to nonaffiliated third parties. However, occasionally it may be necessary in the ordinary course of our relationship to provide information to nonaffiliated third parties to perform our services to further your goals and objectives. These exceptions may include the following:

Service Providers. We have established various relationships with nonaffiliated third parties to assist in providing services to you, or for your benefit. These nonaffiliated third-party relationships are typically situations where another financial institution, such as a custodian or other third-party business (e.g. Charles Schwab), is utilized to carry out or process account set-up, portfolio reporting, or other services for your benefit. For these purposes, we may disclose relevant portions of your personal and financial information to these other businesses to accomplish these initiatives.

Outside Professionals. We may share relevant portions of your information with selected outside professionals approved in advance by you. Such outside professionals might include your CPA, attorney, banker, insurance agent, mortgage company, or other professional consultant.

Processing and Servicing Transactions. We may also share information when it is necessary to effect, administer or enforce a transaction for you or pursuant to your written request. In this context, “Necessary to effect, administer, or enforce a transaction” means that disclosure of your personal or financial information is required, or is a usual, appropriate or acceptable method to carry out, record, service, or maintain a transaction for your account in alignment with our services to you.

Sharing as Permitted or Required by Law. We may disclose information to nonaffiliated third parties as required or allowed by law. This may include, for example, disclosures in connection with law enforcement

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authorities, securities regulations, a fraud investigation, or the recording of deeds of trust and mortgages in public records.

Outside of the exceptions noted above, we will not share your personal information with nonaffiliated third parties unless you have specifically asked us to do so. Under no circumstances do we sell your personal or financial information, sell or disclose our mailing or client lists, or share credit-related information such as income, total wealth and other credit header information, to other businesses or to any outside party.

Because we operate under a “Do Not Share” policy as noted above, it is not necessary to provide an opt-out option for the sharing of your information with nonaffiliated third parties. If our information sharing practices change in the future, we will implement opt-out policies and procedures and provide you with the appropriate disclosures.

Access to Information

We obtain confidentiality agreements from the nonaffiliated third parties we utilize that prohibit them from selling or improperly using your personal or financial information for purpose(s) other than for which it was originally disclosed. If we determine that a nonaffiliated third party has failed to follow these rules and procedures, they will be subject to disciplinary action.

Safeguarding Information

We have implemented internal controls and procedures designed to maintain accurate records concerning your personal and financial information. To protect your information, we maintain appropriate security measures for our computers and information systems, including the use of passwords and firewalls. For non-electronic information, we use shredding machines, locks and other appropriate physical security measures to safeguard client information stored in paper format.

For questions or concerns regarding TO Wealth’s Privacy Policy, please contact Tina Ottersberg at tina@to-wealth.com or 303.209.8480.