

## FACTS

### WHAT DOES GW & Wade, LLC (“GW & Wade”) DO WITH YOUR PERSONAL INFORMATION

#### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

#### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- account balances and wire instructions
- investment experience and account transactions

When you are *no longer* our customer, we continue to share your information as described in this notice.

#### How?

All financial companies need to share customer’s personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer’s personal information; the reasons GW & Wade chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does GW & Wade share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We don’t share
<b>For our affiliates’ everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates’ everyday business purposes—</b> information about your creditworthiness	No	We don’t share
<b>For nonaffiliates to market to you</b>	No	We don’t share

#### Questions?

Call 877-499-1133 or email us at [info@gwwade.com](mailto:info@gwwade.com)

## Who we are

Who is providing this notice?	GW & Wade, LLC
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## What we do

**How does GW & Wade protect my personal information?**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

**How does GW & Wade collect my personal information?**

We collect your personal information, for example, when you

- seek advice about your finances, open an account or give us your income information
- tell us about your investment portfolio or deposit money
- enter into an investment advisory contract

We also collect your personal information from other companies.

**Why can't I limit all sharing?**

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under State law.

## Definitions

**Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include Focus Operating, LLC and GW & Wade Asset Management Company, LLC*

**Nonaffiliates**

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *GW & Wade does not share with nonaffiliates so they can market to you.*

**Joint marketing**

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *GW & Wade does not jointly market.*

## Other important information

If you are a California resident, California law may provide you with additional rights. To learn more about these rights, please access our California Consumer Privacy Act Notice at [gwwade.com](http://gwwade.com)

## **GW & WADE CALIFORNIA CONSUMER PRIVACY ACT PRIVACY NOTICE FOR CALIFORNIA RESIDENTS**

**Posted: March 2020**

We provide this privacy notice (“*Notice*”) to comply with the California Consumer Privacy Act of 2018 (“*CCPA*”). This Notice applies to California residents (“*California residents*” or “*you*”) who engage with us in connection with obtaining or seeking to obtain our service (collective, the “*Services*”). It supplements the privacy policies of GW & Wade, LLC and GW & Wade Asset Management Company (“*GW & Wade*,” “*we*,” or “*us*”).

This Notice describes how we collect, use, and disclose information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“*Personal Information*”). Personal Information does not include aggregate or de-identified information or publicly-available information from government records. GW & Wade does not sell your Personal Information.

### **YOUR CCPA RIGHTS**

If you are a California resident, you have the rights related to your Personal Information including: (1) to request more information about the categories and specific pieces of Personal Information we have collected and disclosed for a business purpose in the last 12 months, (2) to request deletion of your Personal Information, and (3) to not be discriminated against for exercising these rights. You may make these requests by calling 877-499-1133 or emailing [info@gwwade.com](mailto:info@gwwade.com).

We will verify your request by matching information you have previously provided to us to information you provide as part of your request. You have the right to request that an agent submit a request to exercise your rights on your behalf. We require that your agent provide a notarized statement from you authorizing your agent to take the requested action. We reserve the right to contact you directly if we have any questions or concerns about the agent’s submission.

Information about how to exercise your rights is provided below. The CCPA includes exceptions and exemptions that will limit your ability to exercise your CCPA rights for certain types of Personal Information. We will not discriminate against you if you exercise your rights under the CCPA.

#### ***RIGHT TO KNOW***

Under the CCPA, you have the right to request more information about the Personal Information we have collected about you during the past 12 months and what categories of Personal Information we have shared with unaffiliated third parties.

#### **Collection of Personal Information**

- **Information You Provide to Us:** We collect information you provide directly to us. For example, we collect information when you apply for or request information related to our

investment advisory, tax planning, financial planning or administrative services and at events we host, fill out a form, engage GW & Wade, communicate with us via third party social media sites, request client assistance, or otherwise communicate with us. The types of information we may collect include:

- Name, address, personal identifier, IP address, email address, account name; Social Security number, driver's license number, and passport number
- Signature, physical characteristics or description, telephone number, insurance policy number, education, employment, employment history, or financial account information
- Characteristics that may be protected classifications under California or federal law
- Professional or employment-related information
- Education information

We use that information to:

- To provide the investment advisory, tax preparation, financial planning or administration services you have requested;
- To protect the security and integrity of our systems, networks, applications, and data, including detecting, analyzing, and resolving security threats, and collaborating with cybersecurity centers, consortia, and law enforcement about imminent threats;
- To enforce our contracts and to protect against injury, theft, legal liability, fraud, or abuse, and to protect people or property, including physical security programs;
- To deidentify Personal Information or create aggregated datasets, such as for consolidating reporting, research, or analytics;
- For identity and credential management, including identity verification and authentication and system and technology administration;
- For fraud detection and prevention;
- For legal and regulatory compliance, including all uses and disclosures of Personal Information required by law or reasonably needed for compliance with our policies and procedures, such as: anti-money laundering programs, security and incident response programs, intellectual property protection programs, and corporate ethics and compliance hotlines;
- For corporate audit, analysis, and reporting;
- For business continuity and disaster recovery purposes;
- For corporate governance, including mergers, acquisitions, and divestitures; and

### **Other Information We Collect and Its Use**

- In order to continue to make the offering and promotion of our services relevant and topical, for marketing purposes we collect nonpublic information regarding your interaction with our website (including blogs and other articles) and advertisements on social media. We use different technologies to collect information, including cookies. Cookies are small data files stored on your hard drive or in device memory that help us improve our Internet or other electronic network activity, such as browsing history, search history, or advertisement

Services and your experience, see which areas and features of our services are popular, and count visits. Cookies we use are placed by our service providers Google Analytics and HubSpot.

- We may also obtain information about you from other sources. For example, we may collect information about you from third parties, including but not limited to identity verification services and publicly available sources.

### **Sharing of Information**

We may share information about you as follows or as otherwise described in this Notice:

- With vendors, service providers, and professional advisors that perform services for us, including custodians you use, accountants, tax planners, and attorneys, as well companies that provide portfolio accounting; client database management and email storage.
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
- If we believe your actions are inconsistent with our user agreements or policies, if we believe you have violated the law, or to protect the rights, property, and safety of GW & Wade or others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among GW & Wade and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and
- With your consent or at your direction.

We may also share aggregated or de-identified information that cannot reasonably be used by those third parties to identify you.

### ***RIGHT TO ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY***

Under the CCPA, you have the right to request that we disclose the following to you:

- The categories of Personal Information we collected about you.
- The specific pieces of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- The business or commercial purpose for collecting that Personal Information.
- The categories of third parties with whom we share that Personal Information.

Once we receive and confirm your verifiable access request, we will disclose the requested information covering the preceding 12 months, unless an exception applies.

### ***RIGHT TO DELETE***

To the extent provided by the CCPA, you have the right to request that we delete your Personal Information. Once we receive and confirm your verifiable deletion request, we will delete or de-identify (and direct our service providers to delete or deidentify) your Personal Information from our records unless an exception applies or retaining your Personal Information is necessary for us or our service providers to:

- Comply with a legal or regulatory obligation.
- Provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for such activities.
- Debug software to identify and repair errors that impair existing intended functionality.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.).
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## **HOW TO EXERCISE YOUR CCPA RIGHTS**

If you are a California resident, you may exercise your CCPA-provided rights described above by either:

- Visiting [info@gwwade.com](mailto:info@gwwade.com); or
- Calling us at 877-499-1133.

Also, we are not obligated to respond to more than two access requests for the same individual's personal information within a 12-month period.

### ***VERIFICATION OF CONSUMER REQUESTS***

Each verifiable consumer request must provide sufficient information to allow us to reasonably verify that you are the person about whom we collected Personal Information or an authorized agent. We cannot respond to your request if we cannot verify and confirm your identity or authority to make the request.

### ***RESPONSE TIMING AND FORMAT***

We intend to respond to a verified consumer request within 45 days of our receipt. If we require additional time to respond, we will inform you of the reason for additional time needed and anticipated timing for our response. Our response will also explain why we cannot comply with your request, if applicable.

## **SHINE THE LIGHT**

California law permits residents of California to request certain details about how their information is shared with third parties for direct marketing purposes. GW & Wade does not share Personal Information with third parties for their direct marketing purposes.

## **CONTACT US**

You are encouraged to review this Notice regularly, as we may change it from time to time. If we make changes, we will notify you by revising the date at the top of the Notice and, in some cases, provide you with additional notice (such as adding a statement to our website homepage or sending you a notification).

If you have any questions about this Notice, please contact us at [info@gwwade.com](mailto:info@gwwade.com) or 877-499-1133.