

PRIVACY NOTICE

Our Commitment to Your Privacy

GeoWealth Management, LLC (“GeoWealth”) requires that you provide us with current and accurate financial and personal information throughout the course of our relationship. We are sensitive to the privacy concerns of our clients. We have a long-standing policy of protecting the confidentiality and security of information we collect about you. We will protect the information you have provided in a manner that is safe, secure and professional.

We are providing you with this notice to help you better understand why and how we collect certain personal information, the care with which we treat that information, and how we use that information.

Sources and Types of Non-Public Information

We collect and maintain non-public personal information. This non-public information includes, but is not limited to:

- An investor’s name, social security number or taxpayer identification number, contact information (including home address, business address, telephone number and date of birth), financial and investment qualifications or account number at the Firm.

Additionally, this non-public information is collected from the following sources:

- Information we receive from you in conversations over the telephone, in voicemails, through written correspondence (via e-mail, subscription agreements, investor questionnaires, applications, information you input to our client portal, or other forms);
- Information captured on our website, including registration information and any information captured via “cookies,” and information that you input to our client portal.

Information Security

We consider the protection of sensitive information to be a sound business practice, and to that end we employ physical, electronic and procedural safeguards to protect your non-public personal information in our possession or under our control. Additionally, no individual who is not so authorized shall obtain your personal and financial information.

Disclosure of Non-Public Information

We do not disclose any non-public information about you to anyone, except as permitted or required by law or regulation and to certain authorized service providers. Scenarios for which we may share your non-public information include the following:

- When required to maintain or service your account;

- With persons acting in a fiduciary or representative capacity on behalf of your account; ☐ With credit agencies and authorized third party professionals including attorneys, accountants and auditors;
- In connection with a sale or merger of our business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- Via joint marketing agreements with nonaffiliated third parties, such as unaffiliated investment advisers;
- To third-party asset managers you have invested with;
- To respond to a subpoena or court order, judicial process or regulatory authorities;
- In any circumstances with your instruction or consent.

We maintain non-public personal information of our former clients and apply the same policies that apply to our current clients. We do not sell your personal information.

Non-Public Information Retention Policy

All Investor Information is retained in accordance with the Firm’s “Books and Records” Policy as set forth in the Firm’s Compliance Manual. The CCO ensures the security of the Firm’s Investor Information by keeping all Investor Information only in a secure location with limited access designated by the CCO. In the case of all such Investor Information, limited access will be granted to only those Supervised Persons who require such information in the course of their specific job responsibilities. If a Supervised Person requires access to Investor Information, they must receive approval from the Firm’s CCO, who will determine if such access will be approved, and if so, the level of access allowed thereto.

State Privacy Laws

Certain states have adopted privacy regulations that may be applicable to advisers with investors who are residents of those states. To ensure compliance with state privacy requirements, the CCO will periodically review such laws and evaluate whether the Firm’s procedures and controls are sufficient in light of the review. To the extent necessary, the Firm will revise its procedures and institute additional controls in order to comply with applicable state privacy laws.

California

Under the California Consumer Protection Act, California residents have the right to request that we disclose the categories and specific pieces of personal information that we have collected. Upon receiving the request, we will promptly take steps to disclose and deliver, free of charge, the personal information that we have collected

California residents have the right to request that we delete any personal information we have collected. However, in certain circumstances, the information that we collect is necessary for us to provide service to you, fulfill various regulatory obligations, debug to identify and repair errors that may affect the GeoWealth Platform, and is for other internal uses that reasonable aligned with our client relationship. In those circumstances, we may not be able to fulfill the deletion request.

If you make a request under the California Consumer Protection Act, we will make all reasonable efforts to comply with the request and will not alter the services we provide given we are still able to provide services.

Opt-Out Provisions

It is not our policy to share non-public personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. In circumstances where sharing is necessary to service or maintain customer accounts, is mandated by law, or to effect, administer, or enforce a transaction, clients cannot opt out. If you would like to opt out of sharing your nonpublic personal information with third-party investment managers you have invested with, you may contact us at connect@geowealth.com or make the request directly through your primary investment advisor whom shall communicate that request to us.

Questions

If you have any questions, comments, or concerns about this Privacy Policy, please contact connect@geowealth.com.