

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?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don’t share
For our affiliates’ everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes— information about your creditworthiness	No	We don’t share
For nonaffiliates to market to you	No	We don’t share

Questions?

Call 877-499-1133 or email us at info@gwwade.com

Who we are

Who is providing this notice? GW & Wade, LLC

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, Focus Transition Services, LLC, Focus Treasury & Credit Solutions, LLC, SCS Capital Management, 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 www.gwwade.com.

GW & Wade, LLC
GW & Wade Asset Management Company, LLC
CALIFORNIA CONSUMER PRIVACY ACT PRIVACY NOTICE
FOR CALIFORNIA RESIDENTS

Posted: April 2022

Updated: April 2023

We provide this privacy notice (“*Notice*”) to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (“*CPRA*”). 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, LLC (“*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.

COLLECTION OF PERSONAL INFORMATION
USE OF INFORMATION
SHARING OF INFORMATION
DO NOT TRACK SIGNALS
DATA RETENTION
YOUR CCPA RIGHTS
RIGHT TO ACCESS/KNOW
RIGHT TO DELETE
RIGHT TO RESTRICT/OPT-OUT
HOW TO EXERCISE YOUR CCPA RIGHTS
VERIFICATION OF CONSUMER REQUESTS
RESPONSE TIMING AND FORMAT
SHINE THE LIGHT
CONTACT US
APPENDIX 1

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, preparation, financial planning, or administrative services, 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 your: name, email address, postal address, phone number, financial account details, credit card information, government-issued identifiers (e.g., driver's license number and passport number), Social Security number, employment, professional and education-related information, and any other information you choose to provide.
- **Other Information We Collect When You Use our Services:** When you access or use our Services or transact business with us, we automatically collect information about you, including:
 - **Transactional Information about our Engagement:** When you engage us, we collect information about the terms of our Services, our fees and your expectations.
 - **Interaction with our Website and Social Media:** 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.
 - **Log Information:** We collect information related to your access to and use of the Services, including the type of browser you use, app version, access times, pages viewed, your IP address, and the page you visited before navigating to our Services.
 - **Device Information:** We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
- **Information Collected by Cookies and Similar Tracking Technologies:** 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.
- **Information We Collect from Other Sources:** 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, credit bureaus, and publicly available sources.
- **Information We Derive:** We may derive information or draw inferences from you based on the information we collect. For example, we may make inferences about your preferences, financial products and services that may interest you, and your investing patterns and behaviors.

Use of Information

We use the information we collect:

- 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 de-identify 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.

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 you and us, including brokers and custodians you use, accountants, tax planners, and attorneys, as well companies that provide portfolio accounting; client database management and email, voicemail and messaging 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.

Do Not Track Signals

Some browsers have incorporated “Do Not Track” features to enable users to make privacy and security choices. By using these settings, your browser may send a signal to our Website not to collect tracking information. Please note that we do not alter our Website’s data collection and use practices when we see a Do Not Track Signal from your browser.

Data Retention

We retain your Personal Information for as long as we need to in order to carry out the purpose for which you have shared it with us or to comply with applicable law. We may retain aggregate and anonymized information indefinitely.

YOUR CCPA RIGHTS

This section describes the rights provided to California residents over their personal information under the CCPA, including the right to: access/know what information we collect from you; the right to correct that information; the right to restrict our use of certain personal information; and the right to delete your personal information. The CCPA includes exceptions and exemptions that will limit your ability to exercise your CCPA rights for certain types of Personal Information.

GW & Wade does not sell your Personal Information. Information about how to exercise your rights is provided below. We will not discriminate against you if you exercise your rights under the CCPA.

RIGHT TO ACCESS/KNOW

Under the CCPA, you have the right to request 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. 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

Under 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 de-identify) 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.
- 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.

RIGHT TO RESTRICT/OPT-OUT

You can request that we restrict the use of your sensitive information (such as your financial account information and Social Security number) when there is no statutory exemption that allows us to use that information. Please note that GW & Wade only uses such sensitive information to provide you with the services you have requested from us.

HOW TO EXERCISE YOUR CCPA RIGHTS

You may make these requests by

- [Clicking here to exercise your right](#) or;
- Contacting info@gwwade.com or;
- Calling us at 877-499-1133.

VERIFICATION OF CONSUMER REQUESTS

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

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 will only request as much information as is necessary to process your request. 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 by:

- Email at info@gwwade.com or;
- Phone at 877-499-1133.

APPENDIX 1

GW & Wade Categories of Data Collected

The below table lists the categories of Personal Information GW & Wade may collect about its clients and prospects, including examples of information that falls within each category. For each category, we have also provided the categories of sources from which the information was collected, the purposes of collection and use, and the categories of third parties with whom we will share such data. To learn more about how GW & Wade uses your data and your choices, please see our CCPA Privacy Notice for California Residents above.

Category of Personal Information Collected	Categories of Sources of Personal Information	Business or Commercial Purposes for Collection and Use of Personal Information	Categories of Third Parties with Whom Personal Information is Shared
<p>Identifiers, such as:</p> <ul style="list-style-type: none"> • Full name, nicknames, or previous names (such as maiden names) • Mailing address(es) • Email address(es) • Phone number(s) • Contact information for related persons, such as authorized users of your account • Social Security or other taxpayer identification numbers • Passport number • Driver’s license number • Client ID • Bank and brokerage account numbers <p>For security purposes, we will not disclose these identifiers in response to an access request under the CCPA.</p>	<ul style="list-style-type: none"> • You • Other clients • Service Providers • Social media services • Our and third party cookies and other tracking technologies on our website and mobile application 	<ul style="list-style-type: none"> • Provide investment advisory, tax planning and preparation, financial planning, or administrative services • Maintain the integrity of our records • Security and risk management, fraud prevention, and similar purposes • Develop, provide and improve our products and services • Provide client service • Perform our contractual obligations • Maintain our ongoing business relationship • Create and manage your account(s) • Send personalized communications and notifications related to your transactions and account 	<ul style="list-style-type: none"> • Parent, brother-sister or subsidiaries • Service Providers including payment processors, financial institutions to complete transactions and for authentication, security, and fraud prevention • Professional advisors including lawyers, auditors, consultants, and others who provide professional services to GW & Wade • Law enforcement officials and individuals involved in legal proceedings • U.S. Postal Service and other couriers • Address verification providers • Other third parties with your consent or at your direction

		<ul style="list-style-type: none"> • Respond to your communications • Communicate with you about products, services and events that may be of interest to you 	
<p>Financial Information, such as:</p> <ul style="list-style-type: none"> • Bank account number(s) and details • Your account numbers at other financial institutions • Payroll information 	<ul style="list-style-type: none"> • You • Payment processors and other financial institutions • Service providers • We may infer financial information about you (such as interest in certain products or services) based on your existing account status and transaction activity 	<ul style="list-style-type: none"> • Maintain our business relationship with you, including processing purchases and sales of securities in your accounts • For recordkeeping and compliance, including dispute resolution • For internal business purposes, such as finance, audits, training, reporting, and analytics 	<ul style="list-style-type: none"> • Service Providers including payment processors, financial institutions, and others to complete transactions and for authentication, security, and fraud prevention • Professional advisors including lawyers, auditors, consultants, and others who provide professional services to GW & Wade • Other unaffiliated parties (including government agencies) as required by law
<p>Commercial Information, such as:</p> <ul style="list-style-type: none"> • Client account information, transaction history, and related records (such as records of real estate purchases and sales of securities) • Records related to website and mobile application usage • Non-biometric data collected for client authentication (passwords, account security questions) 	<ul style="list-style-type: none"> • You • Other financial institutions involved in processing your transactions (for example, your bank) • Automatically, such as when you use our websites or mobile applications 	<ul style="list-style-type: none"> • To maintain our business relationship with you, including client service • For recordkeeping and compliance, including dispute resolution • For internal business purposes, such as finance, quality control, training, reporting, and analytics • For risk management, fraud prevention, and similar purposes 	<ul style="list-style-type: none"> • Service providers to complete the transaction, including but not limited to electronic and hard copy mailing and delivery providers and print vendors • Professional advisors including lawyers, auditors, consultants, and others who provide professional services to GW & Wade • Other unaffiliated parties (including

<ul style="list-style-type: none"> Client service records 			<p>government agencies) as required by law</p>
<p>Internet or Electronic Network Activity Information, such as:</p> <ul style="list-style-type: none"> IP address Device identifiers or other persistent identifiers System identifiers including online user names or credentials Advertising ID Encrypted password Device characteristics (such as browser information) Web server logs Application logs Browsing data and search history First-party cookies Third party cookies Web beacons, clear GIFs, and pixel tags 	<ul style="list-style-type: none"> You and from your devices when you interact with our websites and mobile applications. For example, when you visit our websites, our server logs record your IP address and other information. Automatically, via technologies such as cookies and web beacons, when you visit our websites or mobile applications Service providers, including computer security services and advertising technology providers 	<ul style="list-style-type: none"> For system administration and technology management, including optimizing our websites and applications For information security and cybersecurity purposes, including detecting threats For recordkeeping and reporting, including logs and records maintained as part of transaction and interaction information For metrics and analytics To better understand our clients and prospective clients and to enhance our relationship information, including by associating you with different devices and browsers you may use For online targeting and advertising purposes To track your use of our products, services, websites, and online 	<ul style="list-style-type: none"> Service providers supporting information technology and security providers, including companies such as network security services that retain information on malware threats detected Service providers supporting fraud prevention, detection, and mitigation Professional advisors including lawyers, auditors, consultants, and others who provide professional services to GW & Wade Unaffiliated network advertising providers Other third parties (including government agencies) as required by law

		services, including for ad delivery and personalization	
<p>Audio, electronic, visual or similar information, such as:</p> <ul style="list-style-type: none"> • Video images • CCTV recordings • Voicemails 	<ul style="list-style-type: none"> • You • Automatically, such as when we use CCTV cameras in our facilities • Unaffiliated parties that provide access to information you make publicly available, such as on social media 	<ul style="list-style-type: none"> • For premises security purposes and loss prevention • For responding to your phone calls 	<ul style="list-style-type: none"> • Service providers who assist with our information technology and security programs and with our loss prevention programs • Professional advisors including lawyers, auditors, consultants, and others who provide professional services to GW & Wade • Other unaffiliated parties (including government agencies) as required by law
<p>Inferences, such as:</p> <ul style="list-style-type: none"> • Inferences drawn about you from your Personal Information, such as your preferences, financial products and services that may interest you, and your investing patterns and behaviors • Propensities, attributes, and/or scores generated by internal analytics programs and used for information security and fraud prevention purposes, product and service development and improvement, and marketing 	<ul style="list-style-type: none"> • We create inferred and derived information by analyzing our relationship and transactional information • We also obtain inferred and derived information from third party data suppliers— companies that collect demographic and other consumer information to help with firms’ marketing and customer service activities 	<ul style="list-style-type: none"> • To better understand you and to understand our clients generally • To design products, services, and programs that may be of interest to our clients • To identify prospective clients • For internal business purposes, such as quality control, training, and analytics 	<ul style="list-style-type: none"> • Service providers, including brokers and/or custodians • Professional advisors including lawyers, auditors, consultants, and others who provide professional services to GW & Wade • Other unaffiliated parties (including government agencies) as required by law

<p>Professional, educational, or employment-related information, such as job title, employer name and industry, date of hire, educational information such as your transcript, income</p>	<ul style="list-style-type: none"> • You • Your employer(s) • Your education provider(s) • Service providers that help us understand our clients, including data aggregators and public records providers 	<ul style="list-style-type: none"> • To establish and maintain our business relationship with you, including processing purchases and sales of securities in your accounts • For recordkeeping and compliance 	<ul style="list-style-type: none"> • Service providers, including brokers and custodians • Professional advisors including lawyers, auditors, consultants, and others who provide professional services to GW & Wade • Other third parties (including government agencies) as required by law
<p>Other information that relates to or is reasonably capable of being associated with you, such as:</p> <ul style="list-style-type: none"> • Child’s name, date of birth, address, Social Security number or other taxpayer identification number, educational information (if account assets are used to pay education expenses directly to an educational institution) • Personal characteristics and preferences, such as your age, marital and family status, and languages spoken • Household demographic data, including from real estate records and census data • Data from public 	<ul style="list-style-type: none"> • We do not collect Personal Information directly from children under 16. We receive limited Personal Information about children from clients (parents and other adults) only as required to establish and maintain accounts for the children’s benefit • Unaffiliated parties that provide access to information you make publicly available, such as social media • Service providers that help us understand our clients, including data aggregators and public records providers 	<ul style="list-style-type: none"> • To provide the information, products, or services requested by the child’s parent or other authorized adult • To better understand you and to understand our clients generally • To design products, services, and programs that may be of interest to our clients • To identify prospective clients • For internal business purposes, such as quality control, training, and analytics 	<ul style="list-style-type: none"> • Service providers, including brokers and custodians • Professional advisors including lawyers, auditors, consultants, and others who provide professional services to GW & Wade • Other third parties (including government agencies) as required by law

<p>social media profiles, such as Facebook, Twitter, LinkedIn, and similar platforms</p> <ul style="list-style-type: none"> • Hobbies and interests 	<ul style="list-style-type: none"> • We may also infer information about you based on information you have given us and on your past interactions with us and other companies. See Inferred and derived information below 		
<p>Characteristics of Protected Classifications Under California or US Law, such as age, race, ethnicity, gender, disability or veteran status</p>	<ul style="list-style-type: none"> • You • Other clients • Service Providers 	<ul style="list-style-type: none"> • Provide advisory or business management services • Maintain the integrity of our records • For internal business purposes, such as quality control, training, and analytics • For recordkeeping and compliance 	<ul style="list-style-type: none"> • Parent, brother-sister or subsidiaries • Service providers, including brokers and custodians • Professional advisors including lawyers, auditors, consultants, and others who provide professional services to GW & Wade • Law enforcement officials and individuals involved in legal proceedings