

Privacy Policy

Wellfin360 ("WF") recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. WF will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information.

In providing financial services to you, we collect certain *nonpublic personal information* ("NPI") about you. Our policy is to keep this information strictly safeguarded and to use or disclose it only as needed to provide services to you, or as permitted by law. Protecting your privacy is important to us. We want our clients to understand what information we collect, how we use it, and how we protect your personal information.

Why We Collect Your Information

We gather information about you so that we can:

- Help design and implement the investment and financial planning related services we provide you; and
- Comply with the Federal and State laws and regulations that govern us.

What Information We Collect and Maintain

We may collect the following types of nonpublic personal information about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information;
- Information that we generate to service your financial needs; and
- Information that we may receive from third parties in connection with the services we provide you.

How We Obtain Your Information

We collect nonpublic personal information about clients such as you from the following sources:

- From you during our initial meeting or subsequent consultations;
- From you via applications, questionnaires or other forms you complete;
- From your transactions with us or others as related to services we provide to you;
- From your other advisors, when authorized by you to share that information;
- Via a web server, if you visit our website. Such information is often referred to as a "cookie." Cookies indicate where a site visitor has been online and what has been viewed.

How We Protect Your Personal Information

Privacy has always been important to WF. We safeguard client information by preventing its unauthorized access, disclosure, or use. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information, including password-protected user access to our computer files and strict confidentiality policies that apply to all WF personnel. Arrangements with companies or independent contractors not affiliated with WF, or any individuals or companies we hire to help us provide services to you, will be subject to confidentiality agreements.

We restrict and limit access to client information only to those WF associates who need to carry out their business functions. WF associates are educated about safeguarding client information and preventing its unauthorized access, disclosure, or use and will be required to acknowledge in writing their acceptance and understanding of our privacy policy.

Privacy Policy

What Information We Disclose

We are permitted by law to disclose nonpublic personal information “NPI” about you to unaffiliated third parties in certain circumstances. Unaffiliated third parties are companies not related to WF by common ownership or control and could be financial and nonfinancial companies.

WF may disclose your NPI:

(1) to individuals and/or entities not affiliated with WF, including, but not limited to, third-parties that assist in the supervision or management of your account(s) (i.e. account custodian, record keeper, attorney, etc.).

(2) to unaffiliated service providers contracted by us for everyday business purposes in order for us to perform the duties of your engagement with WF (i.e. client management systems, financial planning software, archiving technology vendors, cloud service providers, billing software, compliance task management platform, custodian, data gathering platform, portfolio performance reporting, etc.).

(3) to your authorized representative or power of attorney.

(4) when we receive your prior consent; (5) as otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. If we do not receive permission to share this NPI, then we are prohibited from sharing this NPI with unaffiliated third parties.

Former Clients

Even if we cease to provide you with financial services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic information with strict confidentiality. We maintain all records regarding all former clients for the retention period required by law.

Contact Us

Clients are encouraged to discuss any questions regarding privacy policies and procedures directly with Samanda Morales, Chief Compliance Officer of WF. Please contact Samanda Morales at 781-460-8118 or samanda@wellfin360.com.