

# PRIVACY POLICY STATEMENT

May 2021

SAVVI Wealth Partners (SWP) respects your right to privacy. Your privacy is important to us, and maintaining your trust and confidence is one of our highest priorities. We continue to be committed to secure the confidentiality and integrity of your personal information. We are proud of our privacy practices and want our current and prospective customers to understand what information we collect and how we use it.

## 1. Why We Collect Your Information

We gather information about you and your accounts so that we can (i) know who you are and thereby prevent unauthorized access to your information, (ii) design and improve the products and services we offer and (iii) comply with the laws and regulations that govern us. In providing financial services and/or products to you, we collect certain nonpublic personal information 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.

As required by regulations, we will be communicating to you our latest Privacy Policy Statement at least annually.

## 2. Information We Collect About You

The non-public personal information we may have about you includes what you provide to us when opening an account or communicating with us. We may collect the following types of non-public personal information about you:

- Information about your identity, such as your name and address;
- Information about your transactions with us;
- Information which you provide, such as your financial accounts, holdings, assets, beneficiaries or income.

## 3. Sources From Which We Obtain Your Information

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

- Information we receive from you;
- Information provided to us by unaffiliated companies whom you have allowed to share information with us;
- Information about your transactions with us, our affiliates, or others;
- If you visit the Site, information we collect via a web server, often referred to as a "cookie". Cookies indicate where a site visitor has been online and what has been viewed.

## **4. Information We Disclose**

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law and as described in this policy. We will share such information only if one or more of the following conditions is met:

- We receive your prior consent;
- We believe the recipient to be you or your authorized representative;
- We share the information with non-affiliated companies that help us provide services to you, provided that they conform to our privacy standards and agree to be contractually obligated to keep the information provided confidential and used only as authorized;
- We are required by law to release information to the recipient.

We only use information about you and your account to help us better serve your investment needs or to suggest services or educational materials that may be of interest to you. We may share aggregate non-personally-identifiable information with interested third parties to assist them in understanding the usage patterns for certain content, services, advertisements, promotions, and/or functionality on the Site.

If you wish a copy of the information we have about you, please let us know by email at <cco@savviwp.com>

## **5. Retaining Information**

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

If you wish us to remove your information please let us know by email at <cco@savviwp.com>. We will remove your information from all our systems as soon as possible. Please note that there may be legal or regulatory reasons that require us to maintain your information for a period of time. In such cases we will let you know and will remove your information as soon as we are allowed to.

Unfortunately for regulatory and business reasons we are unable to offer you an opt-out policy. If you do not want us to have your information please refrain from using our web sites and our applications.

## **6. Safeguards - Confidentiality & Security**

SWP has procedures in place that we believe are reasonably designed to protect the security and confidentiality of your information. These include confidentiality agreements with companies we hire to help us provide services to you, password-protected user access to our computer files and strict confidentiality policies that apply to all SWP personnel.

We maintain physical, electronic and procedural safeguards to guard your personal account information. To further protect your privacy, we use the highest levels of security, including data encryption, usernames and passwords, and other tools. We also restrict access to your personal and financial data to authorized SWP associates who have a need for these records. We require all non-affiliated organizations to conform to our privacy standards and are contractually obligated to keep the information provided confidential and used as requested. Furthermore, we will continue to adhere to the privacy policies and practices described in this notice even after your account is closed or becomes inactive.

No data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk. Once we receive your transmission of information, we make commercially reasonable efforts to ensure the security of our systems, including use of a firewall, content filtering, intrusion detection, SSL encryption, a DMZ, and access controls. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

If we learn of a security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Site or providing personal information to us, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Site or your personal information. We may post a notice on the Site if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive a free written notice of a security breach (or to withdraw your consent from receiving electronic notice) you should notify us via email at <info@savviwp.com>.

## **7. Children**

We will never knowingly request personally identifiable information from anyone under the age of eighteen (18). No part of the Site is directed to persons under eighteen (18). **IF YOU ARE UNDER EIGHTEEN (18) YEARS OF AGE, THEN PLEASE DO NOT USE OR ACCESS THE SITE AT ANY TIME OR IN ANY MANNER.** Any person who provides their personal information to SAVVI Wealth Partners represents that they are eighteen (18) years of age or older.

## **8. Changes to this Policy**

We will continue to conduct our business in a manner that conforms with our pledge to you, your expectations and all applicable laws.

**We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page prior to the change becoming effective.**