

## TRADITION WEALTH MANAGEMENT, LLC PRIVACY NOTICE

Updated as of 2/1/2021

Tradition Wealth Management (TWM) values our customers and makes it a top priority to safeguard the confidential information of our customers. We are committed to protecting your privacy and maintaining your trust and confidence.

TWM collects information about you to assist us in providing services and products to help you meet your financial goals and objectives and provide high standards of customer service. Additionally, information is obtained from you in order to help us fulfill our legal and regulatory requirements. Information collected may vary depending on the products and services requested and the scope of your engagement with us.

Facts	What does TWM Do with Your Personal Information?
Why?	<p>TWM collects information about you to assist us in providing services and products to help you meet your financial goals and objectives and provide high standards of customer service. Additionally, information is obtained from you in order to help us fulfill our legal and regulatory requirements. Information collected will vary depending on the products and services requested and the scope of your engagement with us.</p> <p>Financial companies choose how they share your personal information. Federal and European Union law gives consumers the right to limit some but not all sharing. Federal and European Union 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.</p>
What?	<p>The types of personal information we collect can include:</p> <ul style="list-style-type: none"><li>● Social Security number</li><li>● Account numbers and information</li><li>● Income</li><li>● Financial Information</li><li>● Assets</li><li>● Insurance, health, and medical information</li><li>● Personal information (address, date of birth, net worth, income)</li></ul> <p><b>We have an obligation to ensure that your personal information is accurate and up to date. Please contact us promptly to correct or remove any information that you think is incorrect.</b></p> <p><i>Use of our website.</i></p> <p>Information relating to usage of our website may be collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We may use your information collected from the website to personalise your repeat visits to the site. Additionally, we may use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information visit <a href="http://www.allaboutcookies.org/">http://www.allaboutcookies.org/</a>.</p> <p>You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.</p> <p><i>Information about connected individuals.</i></p> <p>We may need to gather personal information about your close family members and dependents in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us.</p>

	<p>We'll provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.</p> <p><i>No longer our customer.</i> When you are no longer our customer, we will continue to hold your information and share it as described in this notice</p>
How?	<p>All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons why financial companies can share their customers' personal information, the reasons TWM chooses to share personal information and whether you can limit this sharing.</p> <p>Where third parties are involved in processing your data we'll have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they will maintain the security and confidentiality of your information.</p> <p>When and where necessary for us to transmit or deliver your personal information to a third party, we will use appropriate security measures to protect your personal information in transit. Such methods can include the use of password protection, data encryption, and secured portals.</p>

<b>Reasons We Can Share Your Personal Information</b>	<b>Does Adviser share?</b>	<b>Can you limit this sharing?</b>
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
To fulfill our obligations to aid in the prevention of money laundering and other financial crimes we may send your personal information to third party agencies for identity verification purposes.	Yes	No
For our marketing purposes to offer our products and services to you.	Yes	Yes
For joint marketing with other financial companies.	Yes	Yes

<b>Reasons We Can Share Your Personal Information</b>	<b>Does Adviser share?</b>	<b>Can you limit this sharing?</b>
For our affiliates' everyday business purposes—information about your transactions and experiences. We may share information about our customers to process transactions, maintain your account(s), or respond to court orders and legal investigations.	Yes	No
For our affiliates' everyday business purposes—information about your creditworthiness.	No	NA
For non-affiliates' everyday business purposes to assist us in obtaining business or providing account maintenance or customer service to your account(s).	Yes	No
For our affiliates to market to you—to offer new products or services to you.	No	NA
For nonaffiliates to market to you—we do not sell, share, or disclose your nonpublic personal information to nonaffiliated third-party marketing companies.	No	NA
<p><b>For advisory representatives who leave TWM</b> If your advisory representative leaves TWM to join another investment adviser or other financial institution, the advisory representative may retain copies of your personal information so that he or she can continue to serve you at the new firm. In doing so, your advisory representative may share your information with the new</p>	Yes	Yes

<p>firm but is otherwise required to keep confidential the personal information obtained from you while the advisory representative was affiliated with TWM, and he or she may use it only to service your account(s).</p> <p><b>Please note:</b> Certain states require affirmative consent to allow sharing. See below for more on your rights under state law.</p> <p><b>In the event that a TWM advisory representative terminates his or her relationship with TWM, and you want to follow your advisory representative to his or her new firm, please do not request to limit our sharing.</b></p>		
--	--	--

<b>Who We Are</b>	
<b>Who is providing this notice?</b>	TWM

<b>What We Do</b>	
How does TWM protect my personal information?	<p>TWM recognizes the need to prevent unauthorized access to the information we collect, including information held in electronic format, and we protect your personal information in the following ways:</p> <ul style="list-style-type: none"> <li>• Computer safeguards and secured files and buildings.</li> <li>• We only grant access to your personal information to parties with whom we have executed confidentiality/nondisclosure agreements and who need that information to serve you or to assist us in conducting our operations.</li> <li>• We have physical and electronic safeguards in place to ensure that we comply with our own policy, industry practices, federal and state regulations, and European Union law.</li> <li>• Our employees are trained in the proper handling of sensitive information.</li> </ul>
How does TWM collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> <li>• Open an account</li> <li>• Apply for insurance</li> <li>• Seek advice about your investments</li> <li>• Enter into an investment advisory account</li> <li>• Tell us about your investment or retirement portfolio</li> </ul> <p>We also collect your personal information from others such as credit bureaus, affiliates or other companies.</p>
Why can't I limit all sharing?	<p>Federal and European Union law give you the right to limit only:</p> <ul style="list-style-type: none"> <li>• Sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>• Affiliates from using your information to market to you</li> <li>• Sharing for non-affiliates to market to you</li> </ul> <p>State laws, European Union Law, and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
Marketing	<p>We would like to send you information about our products and services which may be of interest to you. If you've agreed to receive marketing information, you may opt out at a later date by contacting us by one of the methods below. You have a right at any time to stop us from contacting you for marketing purposes or providing your information to other associated Companies. If you no longer wish to be contacted for marketing purposes please contact us using the contact information below.</p>

## How Long We Maintain Your Information

During the course of our relationship with you we'll retain personal data which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our relationship. Additionally, we are subject to regulatory requirements requiring us to retain your data for a specified minimum period, which is generally five years from the date you cease being our customer: This minimum period is the period during which we have a legal obligation to retain your records. Additionally, we reserve the right to retain data for a longer period where we believe it is in our legitimate interests to do so. In any case, we will not keep your personal data for longer than seven years after our relationship with you has ended. You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

## How You Can Access Information We Hold About You

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please contact us using the contact details noted below. When your personal data is processed by automated methods you have the right to ask us to move your personal data to another organization for their use.

## To Limit Our Sharing and Your Rights

- Call TWM at (952) 563 - 6520
- Mail your request to: 7601 France Avenue South, Suite 100, Edina, MN 55435

You also have a right to lodge a complaint with the supervisory authority for data protection. However, in the first instance please contact the TWM Compliance Department at:

Address: 7601 France Avenue South, Suite 100, Edina, MN 55435

Phone: (952) 563 - 6520

## Changes to Our Privacy and Data Use Policy

Any changes we make to this policy in the future will be posted on our website and an updated version of this Privacy Notice will be provided to you so that you are always aware of how we use your Personal Data.

## Definitions

Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies.
Non-Affiliates	Companies not related by common ownership or control. They can be financial and non-financial companies.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. This may include banks, credit unions, or other financial institutions with which we have a joint marketing agreement.

## Other Important Information

Website. Our website contains links to other websites. This privacy policy only applies to our website. Therefore, when you link to other websites you should read their privacy policies and our privacy policy does not extend to any other vendor, company, or third party linked to from our website.

If you live in an "opt-in" state, where we are required to obtain your affirmative consent to share your nonpublic personal information with nonaffiliated third parties who do not currently assist us in servicing your account or conducting our business, your advisory representative is required to obtain your consent before your advisory representative can take your information with him or her should your advisor leave TWM

Information for California, North Dakota, and Vermont Customers

In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.

## **Consent**

We have provided you with a copy of our Privacy Notice which provides information about the nature of our personal data processing activities and includes details of our retention and deletion policies as well as your rights of access to the personal information that we hold on you.