



LIBERTY WEALTH MANAGEMENT

ESTATE LAW • WEALTH MANAGEMENT • TAX PLANNING

Liberty Wealth Management, LLC Privacy and Cookie Policy

(This version of the Privacy Policy is in effect as of May 1, 2023)

General

Liberty Wealth Management, LLC is committed to respecting the privacy of consumers and its customers, including visitors to our website. This Privacy and Cookie Policy sets out how we collect, use, and share personal information. This Privacy and Cookie Policy also explains how we use cookies and similar technologies on our website.

Any changes to this privacy policy will be posted at <https://libertygroupllc.com/privacy-policy/>.

Liberty Wealth Management, LLC (LWM) is registered with the U.S. Securities and Exchange Commission (the "SEC") as an investment adviser and is required to comply with SEC Regulation S-P ("Reg. S-P"), as well as the U.S. Gramm-Leach-Bliley Act of 1999 (the "GLB Act"). Reg. S-P and the GLB Act require LWM to have policies and procedures in place to protect the security and confidentiality of the non-public personal information of consumers and customers and to provide a privacy notice to such persons describing our privacy policies and procedures.

Use of LWM's website constitutes acceptance of this Privacy Policy. The continued use of LWM's website following the posting of changes constitutes your acceptance of such changes.

Glossary

"Consumer" – an individual or an individual's legal representative that obtains or has obtained a financial product or service to be used primarily for personal, household, or family purposes. A person becomes a consumer even if a questionnaire or application is withdrawn or denied or an advisory agreement does not become effective.

"Customer" – a consumer that has an ongoing relationship with LWM, whereby LWM is providing one or more financial products or services to the consumer (e.g., an advisory client of LWM).

"Nonpublic personal information" –

- All personally identifiable financial information.
- While the GLB Act excludes publicly available information (e.g., a list of persons and their publicly listed telephone numbers), nonpublic personal information does include any list, description or other grouping of consumers (and publicly available information pertaining to them) derived using any nonpublic personally identifiable financial information that is not publicly available information.

What Information LWM Collects

LWM collects the following information:

- LWM collects information from individuals who request informational materials, including name, address, telephone number, email address, and investment-related questions.
- LWM may record and/or monitor phone calls for quality assurance and training purposes.
- LWM collects information provided orally and in writing via email, mail, online, or in person from prospective clients, clients, prospective employees, and employees.

- Our website uses cookies and other online tracking technologies to collect technical information, such as IP address, browser used to view the website, operating system, resolution of screen, location, language settings in browser, the site directing to our site, keywords searched, the number of page views, inferences drawn from any personal information, etc. Please see “Cookie Policy” below.

How LWM Uses and Shares Information Collected

LWM may combine personal information collected and use the information for the following reasons:

- Internal record keeping.
- To improve products and services.
- For quality assurance and training purposes.
- To follow up, either by email, phone, or mail, with people who have requested information and/or materials.
- To periodically send promotional email or mail about services, recent developments, or other information individuals may find interesting using the email address or mailing address provided when requesting information.
- To optimize and personalize marketing.
- To access certain special features or areas of this website.
- To evaluate prospective employees for positions and to employ its personnel.
- To analyze the financial situation of prospective clients and to provide investment advisory and management services to clients.
- As otherwise permitted by law.

LWM discloses information externally as permitted or required by law to affiliates, vendors, and regulatory agencies, or where individuals have provided permission.

How to Contact Liberty Wealth Management, LLC:

If you have any questions or concerns regarding this Privacy and Cookie Policy, LWM can be contacted as follows:

privacy@libertygroupllc.com

Liberty Wealth Management, LLC

ATTN: Data Privacy Office

411 30th Street – 2nd Floor

Oakland, CA 94609

1 888.588.5818

Please ensure that your full name and address are provided in exactly the form in which it was originally provided to LWM to avoid any possible confusion with a different individual.

To unsubscribe from LWM’s email communications, send an email to optout@libertygroupllc.com. Please put “UNSUBSCRIBE” in the subject field and include the email address where you received the content, along with any additional email addresses you would like suppressed. We will do our best to prevent you from receiving our email content in the future.

Security

In order to prevent unauthorized access or disclosure, LWM has put in place suitable physical, electronic, and managerial procedures to safeguard and secure information. Nevertheless, due to the nature of the Internet and Internet technologies, security and privacy risks cannot be eliminated and LWM cannot guarantee that information will not be disclosed in ways not otherwise described in this privacy policy.

Notification in the Event of a Data Breach

Although we make good faith efforts to maintain your information securely, no firm or individual can guarantee that shared information will remain free from unauthorized access, use, disclosure, or alteration. If an unauthorized party breaches your personally identifiable information, we will comply with applicable state laws in notifying you of the breach.

Other Websites

The LWM website may contain links to enable users to visit other websites of interest easily. However, once users have used these links to leave this site, users should note that LWM does not have any control over the other website. Therefore, LWM cannot be responsible for the protection and privacy of any information that users provide while visiting such sites and such sites are not governed by this Privacy and Cookie Policy. Individuals should exercise caution and look at the privacy and cookie policies applicable to the website in question.

Cookie Policy

A cookie is a small text file downloaded to an individual's computer (or other device) when accessing webpages that use them. Cookies and other online tracking technologies, such as pixels, tags, or web beacons (collectively referred to in this policy as "**cookies**"), allow a website to store and retrieve information about visitors' online activity. For example, cookies are how a website remembers what display language you chose or what items you put into your online shopping cart.

Cookies can be categorized by who places them:

- **First-party cookies:** These cookies are downloaded to an individual's computer from a server or domain managed by the publisher of the website whose service the individual is requesting.
- **Third-party cookies:** These cookies are downloaded to a computer from a server or domain that is not managed by the publisher but by another entity that may be seeking data obtained through cookies.

Cookies can also be categorized by their duration:

- **Session cookies:** These cookies are designed to collect and store data while the individual accesses a web page. They are often used to store information for the duration of a visit to the site (e.g., what account you are logged into). Once an individual leaves the website, the session cookie is deleted.
- **Persistent cookies:** These cookies store data on a computer for the duration of the period set within the cookie's file, which is determined by the entity controlling the cookie and can range from a few minutes to several years or until manually deleted.

Lastly, cookies can be categorized by the function they serve. LWM uses the following types of first- and third-party cookies:

1. Functionality Cookies

These cookies allow the website to remember choices you make (such as your geographic region or preferred text size). Functionality cookies do not collect any personal information. Enabling functionality cookies may be necessary to access the full content of website material.

2. Personalization Cookies

Personalization cookies allow a website to remember information that changes the page's appearance or behavior, such as, for example, the language selected for viewing the page.

3. Analytics Cookies

Analytics cookies collect pseudonymized information to analyze how individuals browse a website and enable LWM to measure the number of visitors to its websites, as well as to measure and analyze how individuals interact with the site. We use this information to improve the websites and the products or services offered.

4. Behavioral Advertising Cookies

LWM serves advertisements on various websites using third-party companies. If an individual visits a website or clicks on one of LWM's advertisements, behavioral cookies will be placed on the individual's computer. Behavioral cookies allow LWM to manage and optimize its digital marketing (e.g., banner ads, pages offering informational brochures, email campaigns, etc.). Behavioral cookies may be used to build a profile to provide content more relevant to an individual's interests. They adapt advertising and the content an individual sees on other websites based on browsing habits, including how the individual navigates websites, as well as how the individual interacts with internet advertising.

“Do Not Track” Signals

Some internet browsers send signals to each website visited, giving notice of the user’s privacy preferences. LWM’s website recognizes signals sent through “Global Privacy Control” and will honor requests to limit information sharing. Please keep in mind that Global Privacy Control signals are limited to the device and browser. Users should enable Global Privacy Control on each device and browser. If users block or clear cookies, they may need to re-enable Global Privacy Control.

How to Manage Cookies

To learn more about behavioral advertising cookies and to opt in or out of multiple advertising networks at once, you can visit the website [YourAdChoices](#). Some advertising networks do not participate in the YourAdChoices service. To opt out of some of these networks, please visit the [consumer opt-out page](#) of the Network Advertising Initiative.

As explained above, cookies help you to get the most out of the websites that make use of this technology. Disabling cookies may affect the functionality of many of the websites you visit. If you do disable cookies, performance and functionality will be affected. If you wish to delete, disable, or re-enable cookies, you may do so through your browser as follows:

- Microsoft Edge: <https://support.microsoft.com/en-us/microsoft-edge/view-cookies-in-microsoft-edge-a7d95376-f2cd-8e4a-25dc-1de753474879>
- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Safari: <http://www.apple.com/au/support/mac-apps/safari/>
- All other browsers: Please look for a ‘help’ function in the browser or contact the browser provider.

Changes to Privacy Policy

From time to time, LWM may use data for new uses not previously disclosed in its Privacy and Cookie Policy. If its information practices change at some time in the future, LWM will post the policy changes to <https://libertygroupllc.com/privacy-policy/> to notify users of these changes and provide the ability to opt out or unsubscribe from these new uses. For the most up-to-date information on how LWM uses personal information, please visit the privacy policy on our website.

California Residents Only

This privacy policy has been updated effective May 1, 2023.

California residents have rights relating to their personal information described in the chart below. A California resident with questions about our privacy policies should contact us by email at privacy@libertygroupllc.com. A California resident with a disability seeking privacy information in an alternative format should contact us in the same manner. For other contact information, refer to “How to Contact Liberty Wealth Management, LLC” above.

Information Collected and How It Is Used

Categories of Personal Information	Purposes of Collecting and Using Personal Information
Identifiers including name, address, telephone number, email address, investible assets, and other identifying information relating to individuals	Marketing purposes, including delivering informational materials to prospective clients who request them and offering financial services
Commercial information limited to records of informational materials requested and other individual interactions with us	Marketing purposes, including tracking responses from prospective clients and research to improve offerings
Electronic network activity information including IP addresses, interaction with websites or advertisements, and other information as described in “Cookie Policy” above	Marketing purposes, including direct marketing optimization and insight on performance of web-based advertising

Employment-related information, including sensitive personal information	Promote employment opportunities; evaluate qualifications; perform background checks; verify right to work; and administer employment relationship, including payroll and expense reimbursement
Financial and other information obtained in the course of providing investment advice and other services	Provide investment advisory, investment management, other financial services, and non-financial services; enhance client service capabilities; and meet LWM's regulatory obligations
Vendor contact information	To engage with vendors. This includes making payments and communicating with vendor contacts

LWM obtains information used for marketing purposes directly from individuals who request informational materials, through cookies and other online tracking technologies, from existing clients and other referral sources, and from list vendors that gather and sell identifying information. Employment-related information is obtained from third-party recruiters, employee referrals, directly from individuals, and background check providers. Information relating to non-financial services is obtained directly from individuals.

LWM discloses personal information to service providers for the business purposes identified in the chart above. LWM discloses personal information to regulatory agencies, law enforcement authorities, and other third parties when required or authorized by law. LWM discloses email addresses and electronic network activity information to certain advertising and analytics partners, including social media platforms. These third parties use the information to show you ads targeted at your interests. This type of disclosure is defined as "selling" or "sharing" in California law. You may opt out of this disclosure by clicking [here](#). As described above under "Do Not Track Signals," enabling the Global Privacy Control setting in your browser is another way to limit disclosure.

Information used in connection with investment advice, investment management, and other financial services is collected pursuant to the GLB Act and Reg. S-P, directly from prospective clients and clients and from other authorized sources, such as securities account custodians.

LWM uses and discloses sensitive personal information only for the purposes allowed by California law.

LWM does not knowingly "sell" or "share" the personal information of California residents under 16 years of age, as those terms are defined in California law.

LWM retains personal information for internal use in accordance with applicable law and for as long as it is needed to establish, exercise, or defend any legal claims.

California residents may exercise the following rights in relation to the personal information that LWM holds about them. California residents have the right to:

- request **disclosure** of the categories of personal information collected, specific pieces of personal information collected, categories of sources, purposes for collecting and using, and categories of third parties to whom the information is disclosed, "sold," or "shared," as those terms are defined in California law.
- request **deletion** of their personal information.
- request **correction** of inaccurate personal information.
- **not be discriminated** against for exercising their rights with respect to personal information.

To exercise these rights, California residents or their authorized agents should visit the online web form [here](#) or call 1-888-588-0818. Requests must include sufficient information to verify the requester's identity, including name, email, phone, and zip code. Deletion and correction requests will require additional confirmation. For requests submitted by agents, proof of authority, such as a copy of a valid power of attorney, will generally be required. LWM will confirm receipt of a request within 10 days and respond within 45 days.