



LIBERTY GROUP

LIBERTY GROUP HOLDINGS, INC. PRIVACY AND COOKIE POLICY

This version of the Privacy Policy is in effect as of March 28, 2025

General Information

The privacy policy applies to Liberty Group, Holdings, Inc. (collectively referred to as Liberty Group, we, our and us) which operates the following range of businesses through controlled entities: Hollander & Hollander, PC (H&H), Liberty Alternative Asset Management, LLC (LAAM), Liberty Real Estate Management Company, LLC (LREM), Liberty Tax Planners, LLC (LTP), Liberty Wealth Management, LLC (LWM), DBA Liberty Group, and Lifetime Planning Marketing, Inc. (LPM), CA # OF17020.

Liberty Group is committed to protecting your privacy and safeguarding your personal information. In this Privacy and Cookie Policy (Policy), we explain how we collect, use, share, retain and transfer information you may provide when you visit our website, our ads or respond to applications we may provide or through the use of our services. We also let you know your rights regarding the personal information we collect.

LWM is registered with the U.S. Securities and Exchange Commission as an investment adviser and is required to comply with Regulation S-P (Reg. S-P), and the Gramm-Leach-Bliley Act of 1999 (GLBA). These regulations mandate that our firm establish and maintain policies and procedures designed to protect the security and confidentiality of consumers' and customers' nonpublic personal information. Additionally, Reg. S-P and GLBA require us to provide a privacy notice outlining our privacy policies and procedures to these individuals.

If you are a California resident, you may have additional rights under the California Privacy Rights Act (CPRA). Please see our California Privacy Notice for additional disclosures and privacy protections.

For information about our Short Message Service (SMS) Privacy Policy, please refer to our SMS Privacy Policy.

Any changes to our privacy practices will be posted on our website under Privacy Policy.

How We Collect Information

We collect information through the following methods:

- **Event and Newsletter Sign-Ups:** When individuals register for events, newsletters, or other informational resources.
- **Requests for Informational Materials:** When individuals request brochures, guides, or other materials.
- **Phone Calls and Video Meetings:** Calls and virtual meetings may be monitored for quality assurance and training purposes.

- Direct Requests: Information may be collected orally or in writing via email, mail, online forms, text messages, or in person from prospective clients, clients, prospective employees, and employees.
- Website Tracking Technologies: Our website uses cookies and other tracking technologies to collect technical data, including IP addresses, browser type, operating system, screen resolution, geographic location, browser language settings, referring websites, search keywords, page views, and inferences drawn from personal information. For details, please refer to our Cookie Policy below
- SMS Text Message Sign-Ups: When individuals opt in to receive SMS text messages. For more details regarding our SMS practices, please refer to our [SMS Privacy Policy](#).

Types of Information We Collect

We collect the following types of information:

- Name
- Date of birth
- Postal address
- Telephone numbers
- Email address
- Company name
- Banking information
- Information related to transactions with us
- Information related to any employment application, including employment and education history
- Demographic information including, but not limited to, age, birthdate, state of residence, marital status, home ownership status, occupation, education, that we analyze for statistical purposes

How We Use and Share Collected Information

Liberty Group 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 or required by law to affiliates, vendors, and regulatory agencies, or where individuals have provided permission
- [Marketing Activities](#)

We may also use personal information to communicate with clients and prospects regarding marketing activities, including:

- Company newsletters that provide updates on financial trends, market insights, and company news
- Topical emails focused on financial topics or timely issues that may impact investments and financial planning

- Client event details and invitations: Information about upcoming client events, webinars, and seminars, including our quarterly state of the union webinar
- **Opt Out of Marketing Communications**
 - Marketing communications from Liberty Group can be opted out of at any time.
 - To unsubscribe, follow the instructions included in the communication, such as clicking the "unsubscribe" link located in the footer of our emails.
 - Another option is to send an email to optout@libertygroupllc.com with "UNSUBSCRIBE" in the subject line. Provide the email address where you received the message, along with any additional addresses you would like suppressed.
 - Communication preferences will be updated promptly once a request is received. Every effort will be made to ensure marketing emails are no longer sent.
 - Please note that business-critical communications will continue to be sent, including those required by regulatory agencies.

Requests to Access, Correct, or Delete Your Information

You may contact us regarding your personal information and make the following requests:

- Access: Request access to the personal information we have collected about you
- Correction: Request corrections to inaccurate or incomplete personal information
- Deletion: Request the deletion of your personal information under certain circumstances

To submit a request, click [here](#) or call 1.888.588.5818. Provide sufficient information to verify your identity, including name, email, phone, and zip code. Additional confirmation may be required for deletion and correction requests.

How We Protect Your Information

Liberty Group maintains a comprehensive information security program designed to ensure the security and confidentiality of customer information, protect against threats or hazards to the security of such information and prevent unauthorized access. This program includes:

- Procedures and specifications for administrative, technical, and physical safeguards
- Security procedures related to the processing, storage, retention, and disposal of confidential information
- Programs to detect, prevent and, when necessary, respond to attacks, intrusions or unauthorized access to confidential information
- Restricting access of customer information to employees who need to know that information to provide products and services to you and appointing specific employees to oversee our information security program

Cybersecurity and Data Breach Notifications

Liberty Group is committed to maintaining the security of your personal information. In compliance with state-level data breach laws, procedures are in place to address data breaches, including prompt notification to affected parties and the relevant regulatory authorities. Cybersecurity protocols are regularly reviewed and updated to ensure ongoing compliance with both state and federal regulations.

Potential Federal Privacy Law: American Data Privacy and Protection Act (ADPPA)

While the American Data Privacy and Protection Act (ADPPA) is not yet law, it has gained significant traction and could establish comprehensive federal standards for data privacy. Liberty Group is closely monitoring developments related to ADPPA and is prepared to update our privacy practices in accordance with any new federal requirements that may arise. This proactive approach ensures that we remain compliant and continue to prioritize the protection of your personal information.

Gramm-Leach-Bliley Act Safeguards Rule

LWM adheres to the updated Gramm-Leach-Bliley Act Safeguards Rule, which emphasizes the need for enhanced protection measures around nonpublic personal data, especially concerning third-party service providers. Our firm has implemented robust security protocols, including regular audits, risk assessments, and stringent controls over third-party access to nonpublic personal data, to ensure compliance with these regulations.

Other Websites

Our 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 Liberty Group does not have any control over the other website. Therefore, Liberty Group 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 review the privacy and cookie policies applicable to the website in question.

Children

Our website is not directed to children under the age of 18 years. By using our website, you represent and warrant that you are at least 18 years old.

We respect the privacy of children and do not knowingly collect or retain personally identifiable information or nonpublic information from children under the age of 18 through our website. However, we may process nonpublic information, on a child's behalf, with permission from the parent or guardian.

To the extent we have unintentionally collected any nonpublic information on our website from a person under the age of 18 years old, you may request and obtain removal of this nonpublic information.

Former Clients

Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic personal information with strict confidentiality.

Cookie Policy

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

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. Liberty Group uses the following types of first- and third-party cookies:

- **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.
- **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.
- **Analytics Cookies:** Analytics cookies collect pseudonymized information to analyze how individuals browse a website and enable Liberty Group 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.
- **Behavioral Advertising Cookies:** Liberty Group serves advertisements on various websites using third-party companies. If an individual visits a website or clicks on one of Liberty Group's advertisements, behavioral cookies will be placed on the individual's computer. Behavioral cookies allow Liberty Group 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.

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>
- Chrome: <https://support.google.com/chrome>
- Firefox: <https://support.mozilla.org>
- Safari: <http://www.apple.com>
- All other browsers: Please look for a 'help' function in the browser or contact the browser provider.

Do Not Track Signals

Some internet browsers send signals to each website visited, giving notice of the user's privacy preferences. Liberty Group'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.

Definitions Related to our Privacy Policy

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 Liberty Group, whereby we are providing one or more financial products or services to the consumer (e.g., an advisory client of Liberty Wealth Management).

Nonpublic Personal Information

- All personally identifiable financial information.
- While GLBA excludes publicly available information, nonpublic personal information includes any list, description, or grouping of consumers (including their publicly available details, such as publicly listed telephone numbers) if it is derived using nonpublic, personally identifiable financial information that is not publicly available.

CALIFORNIA PRIVACY NOTICE – FOR CALIFORNIA RESIDENTS

This notice of collection of personal information and privacy policy applies to the collection of personal information from California residents on and after January 1, 2023. This CPRA privacy notice supplements Liberty Group's Privacy Policy to provide California residents with additional information about their privacy rights as required by the California Privacy Rights Act (CPRA). This CPRA Privacy Policy applies only to individuals residing in California who are considered consumers under CPRA and from whom we collect personal information as described in CPRA.

We refer to personal information according to the following definition given in CPRA: personal information means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. Personal information does not include publicly available information, information that is de-identified or aggregate consumer information, or information or rights that are outside the scope of CPRA, including non-public personal information that is within the scope of the Gramm-Leach-Bliley Act (GLB Act).

By using our site, viewing our content (including our videos) or submitting your personal information to us, you consent to the collection, processing, use and disclosure of your personal information as set forth in this CPRA Privacy Policy, as it may be updated from time to time.

Information Collected and How It Is Used

<u>Categories of Personal Information</u>	<u>Purposes of Collecting and Using Personal Information</u>
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 Liberty Group's regulatory obligations
Third-party service provider (TPSP) contact information	To engage with TPSPs. This includes making payments and communicating with TPSP contacts

Liberty Group 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 TPSPs 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.

Liberty Group discloses personal information to third-party service providers for the business purposes identified in the chart above. Liberty Group discloses personal information to regulatory agencies, law enforcement authorities, and other third parties when required or authorized by law. Liberty Group 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 GLBA and Regulation S-P, directly from prospective clients and clients and from other authorized sources, such as securities account custodians.

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

Liberty Group 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.

Liberty Group 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 Liberty Group 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.

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.

To exercise these rights, California residents or their authorized agents should click [here](#) or call 1.888.588.5818. 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. Liberty Group will confirm receipt of a request within 10 days and respond within 45 days.

Changes to California Privacy Policy

If our California Privacy Policy changes, the changes will be posted on [our website](#).

How to Contact Liberty Group

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

privacy@libertygroupllc.com

Liberty Wealth Management, LLC

ATTN: Data Privacy Officer

411 30th Street, 2nd Floor

Oakland, CA 94609

1.888.588.5818

SMS PRIVACY POLICY

Effective Date: March 28, 2025

Liberty Wealth Management, LLC., DBA, Liberty Group and its Affiliates (collectively referred to as “Liberty Group” “we,” “us,” or “our”) are committed to protecting your privacy. This Short Message Service (SMS) Privacy Policy explains how we collect, use, disclose, and safeguard your information when you opt-in to receive SMS messages from us.

Information We Collect

When you opt-in to our SMS program, we may collect the following information:

- Name
- Contact information, such as your phone number
- Any other information you provide to us through SMS

How We Use Your Information

If you have consented to receive text messages from Liberty Group, we use the information we collect to:

- Send you SMS messages related to our services
- Respond to your inquiries and provide customer support
- Remind you of upcoming appointments or events

Disclosure of Your Information

The information obtained as part of the SMS consent process will not be shared with third parties or affiliates for marketing purposes. However, we may share your information with the following parties:

- Service providers who assist us in delivering SMS messages
- Law enforcement or regulatory agencies if required by law

Opt-In Method

You may opt-in to receive SMS messages from Liberty Group in the following ways:

- By texting “**START**” directly to your advisor
- By email request directly to your advisor
- Text “**HELP**” to 510-808-4881 for assistance
- Verbally, during a conversation

Opt-Out Method

You can opt out of receiving SMS messages at any time in the following ways:

- Reply “**STOP**” to any SMS message you receive
- Call us at 1-888-588-5818 to request removal from our messaging list
- Send an email to: optout@libertygroupllc.com
- By email request directly to your advisor
- Text “**HELP**” to 510-808-4881 for assistance
- Verbally, during a conversation

Your Rights

You have the following rights concerning your personal information:

- Access: You can request access to the personal information we hold about you.
- Correction: You can request corrections to inaccurate or incomplete personal information.

- Deletion: You can request the deletion of your personal information under certain circumstances.
- Opt-Out: You can opt-out of receiving SMS messages from us at any time.

To exercise these rights, please complete one of the following:

- Contact our privacy officer at: privacy@libertygroupllc.com
- Reply **HELP** to the message to learn how to receive help
- Text "**HELP**" to 510-808-4881 for assistance

Message Frequency

Message frequency may vary depending on the type of communication. For example, you may receive up to two SMS messages per week related to your appointments.

Potential Fees for SMS Messaging

Please note that standard message and data rates may apply, depending on your carrier's pricing plan. These fees may vary if the message is sent domestically or internationally.

Data Security

We employ robust security measures to protect your personal information from unauthorized access, disclosure, alteration, and destruction. These measures include encryption, access controls, and regular security assessments.

Changes to This Policy

We may update this SMS Privacy Policy from time to time. We will notify you of any changes by posting the new policy on our website and updating the effective date.

Contact Us

If you have any questions or concerns about this SMS Privacy Policy, please contact us at:

Liberty Wealth Management, LLC
411 30th Street, Suite 200
Oakland, CA 94609
privacy@libertygroupllc.com
1-888-588-5818