



LIBERTY GROUP

Liberty Wealth Management, LLC Privacy and Cookie Policy

This version of the Privacy Policy is in effect as of September 5, 2024

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 (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 (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.

If you are a California resident, you may have rights under the California Privacy Rights Act (CPRA). Please see our [CPRA Privacy Notice](#) for additional disclosures and privacy protections concerning your use of the site for California residents.

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 A person becomes a consumer even if a questionnaire or application is withdrawn or denied or an advisory agreement does not become effective.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, 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.

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

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

Clients may opt in to receive these communications through our [Opt-In Marketing Communications form](#). By opting in, clients agree to receive these types of communications via email, phone, or text message.

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

Opt-Out Information

Clients have the right to opt out of receiving marketing communications at any time. However, opting out of marketing communications will exclude you from receiving communications related to client events, including our quarterly state of the union webinar where we share important market and firm updates.

To opt out, please follow the instructions provided in the communications you receive, such as the unsubscribe button in email footers, or contact us at optout@libertygrouppllc.com. Please note that clients cannot opt out of business-critical emails, such as those required by regulatory agencies.

We respect your privacy and will promptly update your preferences upon receiving your request.

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@libertygrouppllc.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@libertygrouppllc.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.

Cybersecurity and Data Breach Notifications

LWM is committed to maintaining the security of your personal information. In compliance with state-level data breach laws, we have established procedures to handle data breaches, including timely notifications to affected clients and regulatory bodies. These procedures ensure that, in the event of a data breach, you are promptly informed, and appropriate measures are taken to protect your information. We regularly review and update our cybersecurity protocols to meet or exceed state and federal requirements.

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. LWM 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 client 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 client data, to ensure compliance with these regulations and safeguard client information.

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 review 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:

- **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 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.
- **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.

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.

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.

California Privacy Rights Act Privacy Policy

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 LWM'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 LWM's regulatory obligations
Third-party service provider (TPSP) contact information	To engage with TPSPs. This includes making payments and communicating with TPSP 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 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.

LWM discloses personal information to third-party 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 Regulation 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.

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. LWM will confirm receipt of a request within 10 days and respond within 45 days.

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.