

## **Privacy Policy and Terms of Use**

Regulation S-P, Privacy of Consumer Financial Information, requires financial institutions, including The Advocate Group, to provide notice to current clients and prospective clients about their policies and practices concerning the collection and use of customer, non-public information. This privacy policy notice is given to all prospective clients of The Advocate Group upon entering into a contract with The Advocate Group and re-distributed if there have been any material changes.

### **Privacy Disclosure Statement**

A primary goal of The Advocate Group is to protect the privacy of its clients. The Advocate Group does not sell the personal information of clients to anyone. To conduct regular business, The Advocate Group may collect nonpublic personal information from clients. This information is provided by clients to The Advocate Group on applications and other forms provided by clients to The Advocate Group, our affiliates, or others.

The Advocate Group may enter into contracts with outside third parties so that The Advocate Group can assist its clients in servicing their accounts. To do this, The Advocate Group will disclose personal information to companies that help The Advocate Group process transactions for client accounts. However, The Advocate Group does not share or disclose any nonpublic customer information except as allowed or required by law. In addition to sharing information in order to provide financial services to clients, The Advocate Group may be required to disclose personal information to cooperate with regulators or law enforcement authorities, to resolve customer disputes, or for risk control.

### **Information Safeguarding**

The Advocate Group has implemented strict policies and procedures aimed at protecting the sensitive nature of client information. The Advocate Group restricts access to client information to only those members of The Advocate Group that must provide products and services to clients in order to service client accounts and to other pre-approved third-party service providers such as accountants and attorneys. The Advocate Group has implemented physical, electronic, and procedural safeguards aimed at meeting The Advocate Group's duty to protect nonpublic client information. These safeguards apply to current and past clients and prospects.

Personally identifiable information about our clients will be maintained during term of the advisory relationship and for a time thereafter, as required by federal and state security laws. After this time of required record retention, all such information may be destroyed without notice to the client.

We make every effort to keep our records up to date. If you identify an inaccuracy in your personal information, or you need to make a change, please contact The Advocate Group promptly.

If you have any questions concerning The Advocate Group's customer privacy policy or concerns about your personal information please feel free to contact The Advocate Group.

### **Terms of Use**

Like many other websites, The Advocate Group's website may use cookies and similar technologies. When you use our website, our web server sends a cookie to your computer. A cookie is an electronically transmitted file that holds small pieces of information and may facilitate your use of certain features of our website by eliminating the need to re-enter information. Cookies and similar technologies may collect information such as your IP address, browser and device characteristics, referring URLs and traffic patterns

on our website. Cookies do not act maliciously on computer systems. Users can disable cookies by adjusting browser preferences on their personal computer at any time; however in some cases, this may limit the ability to take advantage of all features on our website.

The Advocate Group and our third-party providers may also use web analytical tools to help gather personal information about usage of our website and client portals including viewing of content made available through client portals. These tools allow us and our third-party vendors to manage and improve our website and services and will only be used to assist and third-party vendors on our behalf, in providing services.

The Advocate Group website may provide a contact form and may provide other types of forms that allow you to provide us with information and request information and/or register for events. Users do not have to provide The Advocate Group with any personal information through our website. The Advocate Group may share or give access to this personal information to our affiliates or other companies that we hire to perform these services on our behalf. If The Advocate Group provides or gives access to personal information to outside companies, we require them to use the personal information for the limited purposes for which we shared the information. If you believe The Advocate Group or any company associated with us has misused any of your information please contact our Chief Compliance Officer immediately and report such misuse.

The Advocate Group may send you newsletters or information about services on a periodic basis. To opt-out of any specific electronic communication, click on the opt-out button associated with the specific communication or follow the instructions to unsubscribe from future e-mails.

If you are a client or prospective client (or a respective duly authorized representative), you may have been granted access to certain nonpublic portions of the website or service offerings otherwise made accessible (for example, by an electronic invitation providing a link to a log-in page) through a uniquely assigned log-in from The Advocate Group.

The use of Client Portal services are completely optional and provided for your convenience. You can choose whether or not you would like to use these services. Our Client Portals are subscription-based services that we procure from third party providers for use by our clients.

Note that if you have been granted access to an eMoney account for online wealth management planning, such service is provided by eMoney Advisor, LLC ("eMoney") and your use of the eMoney portal shall be subject to the eMoney Terms of Service Agreement as made available to you on such portal and eMoney's privacy policy.