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## PRIVACY POLICY

Investment advisors are required by law to inform consumers and customers of their policies regarding their handling of Non-public personal information (“NPI”). At Evolve Wealth Advisors LP (Limited Partners) and its Affiliates (collectively, “Evolve Wealth Advisors,” “we,” “our,” or “us”), due to the relationships that we have with our clients, we consider ourselves bound by professional standards of confidentiality that are even more stringent than those required by law, and it is an objective of the company to protect the privacy of all clients and customers. We understand that keeping your personal information private is an important concern, and we want you to understand how we gather and use NPI to provide services to you.

### TYPES OF NPI WE COLLECT

We collect information about you that is either provided to us by you or obtained by us with your authorization. This information can include, but is not limited to, your name, address, phone number, email address(es), social security number, date of birth, banking information, financial account numbers and/or balances, sources and amounts of income and expenses, assets and liabilities, and, in very limited cases, credit card numbers and/or information. Information that is NPI, meaning that it is not readily known or accessible in the public realm, like your social security number, date of birth, net worth, assets and income, as well as the fact that you have an account with us is NPI and protected.

### WHERE WE MAY OBTAIN THIS INFORMATION

We may collect information directly from you in conversations with you, on applications, website input fields, and other forms that you complete. Additionally, we obtain information about your transactions with us and others such as custodians, broker/dealers, and other companies. With your consent, we may also obtain information from your other advisors and professionals.

### PARTIES TO WHOM WE DISCLOSE INFORMATION

Like most modern businesses, we may need to share personal information to run our everyday operations. We do not disclose any NPI about our customers or former customers inconsistent with this policy without express authorization, except where we are compelled to do so by law. We restrict access to NPI internally to those employees and officers who require that information to

provide our products and services to you. We want to assure all our clients, past, present, and future, that we safeguard the NPI provided to us and only use it for necessary business purposes and with the utmost of integrity, discretion, and professional judgment. In the section below, we list the reasons that we may share your NPI:

- For everyday business purposes – such as to process your transactions, maintain your account(s), provide investment management advice and services to you, or provide statements or other records relating to the status or value of your accounts to you;
- For exceptional business purposes – if a merger, acquisition, debt financing transaction, sale of our assets, bankruptcy, insolvency, or receivership occurs, we may disclose NPI that is necessary or incidental to those purposes and to the third party involved;
- To you and persons whom we believe to be your authorized agent(s) or representative(s);
- For regulatory purposes – from time to time, we may be required to give information about our business and customers to regulatory authorities or to respond to judicial process;
- For our marketing – to offer our products and services to you for joint marketing with other financial companies; and
- For our affiliates’ everyday business purposes – information about your transactions and experiences and information about your creditworthiness.

We do not sell, share, or disclose your NPI to unaffiliated third-party marketing companies.

If you are a new customer, we may begin sharing your information on the day you sign our agreement. When you are no longer our customer, we may continue to share your information as described in this notice; however, you can contact us at any time to limit our sharing, as described below, and provided by law.

#### **FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING - OPTING OUT**

*Federal law allows you the right to limit the sharing of your NPI by "opting out" of the following: sharing for affiliates' everyday business purposes, information about your creditworthiness; or sharing with affiliates or non-affiliates who use your information to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.*

#### **OTHER RIGHTS AND REMEDIES**

To the extent permitted by the law of the state where you reside, you may request to have your NPI corrected if, for example, it is incomplete or incorrect. You may also opt out of receiving marketing material at any time, and you may, if you believe that your NPI has been used inappropriately, file a complaint with your local government privacy officer or ombudsperson, if such an office has been established. If you believe that your information has not been used properly, please contact us about the matter so we can speak with you and remedy the situation immediately and directly between us.

#### **PROTECTING CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION**

To protect your personal information from unauthorized access and use, we employ security measures that we believe are designed to protect the security and confidentiality of your information and that comply with federal law. These measures include confidentiality agreements with companies with whom we contract to provide services, password-protected user access to our computer files, training of employees, and strict policies for our employees regarding the use of confidential information.

We require third parties who help us provide our services

to you to protect the personal information they receive from us, including our customers' and clients' NPI.

To the extent permitted by applicable law, we retain your NPI for the period necessary to serve the purposes for which it was provided or obtained. We may also retain the information beyond such a period to comply with applicable laws and regulations and to comply with our contractual obligations, legal and regulatory obligations, legal claims, or another legitimate interest.

Even if you cease to be our client or customer, this Privacy Policy will continue to apply, and we will continue to treat your NPI as confidential information.

#### **CHANGES TO OUR POLICY**

If Evolve Wealth Advisors changes this Privacy Policy to allow us to disclose NPI not covered under applicable law, we will allow clients and customers the opportunity to opt out of such disclosure to the extent provided by law.

#### **CALIFORNIA RESIDENTS**

The state of California has a specific piece of legislation regarding the use of certain types of personal information: the *California Consumer Privacy Act* ("CCPA").

Evolve Wealth Advisors has a supplemental disclosure for California residents that will be provided to you, if applicable, when you become a customer or client and at any other time upon your request. The California Supplement is to be read in conjunction with this Privacy Policy, but in the case of conflict between the two, for California residents, the California Supplement shall govern.

#### **DEFINITIONS:**

- Affiliates - companies related by common ownership or control including financial and non-financial companies
- Non-affiliates - companies not related by common ownership or control including financial and non-financial companies
- Joint marketing - a formal agreement between non-affiliated financial companies that together market financial products or services to you.

*Your privacy, our professional ethics, and the ability to provide you with quality financial services are especially important to us. Thank you for trusting us to serve you.*