Connectus Wealth, LLC
CALIFORNIA CONSUMER PRIVACY ACT PRIVACY NOTICE
FOR CALIFORNIA RESIDENTS

Posted: May 18, 2023

We provide this privacy notice ("***Notice***") to comply with the California Consumer Privacy Act of 2018 ("***CCPA***"). This Notice applies to California residents ("***California residents***" or "***you***") who engage with us in connection with obtaining or seeking to obtain our service (collective, the "***Services***"). It supplements the privacy policies of Connectus Wealth, LLC, Atlas Private Wealth, Hunt Valley Wealth, NEIRG Wealth Management, Mid-Continent Capital, NorthCoast Asset Management, and the Gavin Group. ("[***the Firm***]," "***we***," or "***us***").

This Notice describes how we collect, use, and disclose information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("***Personal Information***"). Personal Information does not include aggregate or de-identified information or publicly available information from government records.

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YOUR CCPA RIGHTS

If you are a California resident, you have the rights related to your Personal Information including: (1) to request more information about the categories and specific pieces of Personal Information we have collected and disclosed for a business purpose in the last 12 months, (2) to request deletion of your Personal Information, and (3) to not be discriminated against for exercising these rights. You may make these requests by calling (646) 560-4000 or visiting this page info@connectuswealth.com

We will verify your request by matching information you have previously provided to us to information you provide as part of your request. You have the right to request that an agent submit a request to exercise your rights on your behalf. We require that your agent provide a notarized statement from you authorizing your agent to take the requested action. We reserve the right to contact you directly if we have any questions or concerns about the agent's submission.

Connectus Wealth LLC does not sell your Personal Information. Information about how to exercise your rights is provided below. The CCPA includes exceptions and exemptions that will limit your ability to exercise your CCPA rights for certain types of Personal Information. We will not discriminate against you if you exercise your rights under the CCPA.

RIGHT TO KNOW

Under the CCPA, you have the right to request more information about the Personal Information we have collected about you during the past 12 months and what categories of Personal Information we have shared with unaffiliated third parties.

Collection of Personal Information

- **Information You Provide to Us**: We collect information you provide directly to us. For example, we collect information when you apply for or request information related to our investment advisory, or business management services, fill out a form, engage the Firm, communicate with us via third party social media sites, request client assistance, or otherwise communicate with us. The types of information we may collect include your name, email address, postal address, phone number, financial account details, government--issued identifiers, and any other information you choose to provide such as employment or educationally related details.

- **Other Information We Collect When You Use our Services**: When you access or use our Services or transact business with us, we automatically collect information about you, including:
    - **Usage Information:** We collect information about your use of the Services, such as the information and documentation you upload, etc.
    - **Transactional Information about our Engagement:** When you engage us, we collect information about the terms of our Services, our fees, and your expectations.
    - **Log Information:** We collect information related to your access to and use of the Services, including the type of browser you use, app version, access times, pages viewed, and your IP address.
    - **Device Information:** We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
    - **Location Information:** We may derive the approximate location of your device from your IP address.

- **Information Collected by Cookies and Similar Tracking Technologies**: We (and our service providers) use different technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular, and count visits. Web beacons (also known as "pixel tags" or "clear GIFs") are electronic images that may be used in our Services or emails and help deliver cookies, count visits, and understand usage and campaign effectiveness.

- **Information We Collect from Other Sources**: We may also obtain information about you from other sources. For example, we may collect information about you from third parties, including but not limited to identity verification services, credit bureaus, and publicly available sources. Additionally, if you create or log into your account through a social media site, we will have access to certain information from that site, such as your name, account information, and friends lists, in accordance with the authorization procedures determined by such social media site.

- **Information We Derive**: We may derive information or draw inferences from you based on the information we or our partners collect. For example, we may make inferences about your preferences, financial products and services that may interest you, and your investing patterns and behaviours.

Use of Information

We use the information we collect:

- To provide the investment advisory, or business management services you have requested;
- To protect the security and integrity of our systems, networks, applications, and data, including detecting, analyzing, and resolving security threats, and collaborating with cybersecurity centers, consortia, and law enforcement about imminent threats;
- To enforce our contracts and to protect against injury, theft, legal liability, fraud, or abuse, and to protect people or property, including physical security programs;
- To de-identify Personal Information or create aggregated datasets, such as for consolidating reporting, research, or analytics;
- For identity and credential management, including identity verification and authentication and system and technology administration;
- For fraud detection and prevention;
- For legal and regulatory compliance, including all uses and disclosures of Personal Information required by law or reasonably needed for compliance with our policies and procedures, such as: anti-money laundering programs, security and incident response programs, intellectual property protection programs, and corporate ethics and compliance hotlines;
- For corporate audit, analysis, and reporting;

- For business continuity and disaster recovery purposes; and
- For corporate governance, including mergers, acquisitions, and divestitures.

Sharing of Information

We may share information about you as follows or as otherwise described in this Notice:

- With vendors, service providers, and professional advisors that perform services for us, including accountants, tax planners, and attorneys;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
- If we believe your actions are inconsistent with our user agreements or policies, if we believe you have violated the law, or to protect the rights, property, and safety of Connectus Wealth, LLC or others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among Connectus Wealth, LLC and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and
- With your consent or at your direction.

We may also share aggregated or de-identified information that cannot reasonably be used by those third parties to identify you.

RIGHT TO ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY

Under the CCPA, you have the right to request that we disclose the following to you:

- The categories of Personal Information we collected about you.
- The specific pieces of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- The business or commercial purpose for collecting that Personal Information.
- The categories of third parties with whom we share that Personal Information.

Once we receive and confirm your verifiable access request, we will disclose the requested information covering the preceding 12 months, unless an exception applies.

RIGHT TO DELETE

Under the CCPA, you have the right to request that we delete your Personal Information. Once we receive and confirm your verifiable deletion request, we will delete or de-identify (and direct our service providers to delete or deidentify) your Personal

Information from our records unless an exception applies or retaining your Personal Information is necessary for us or our service providers to:

- Comply with a legal or regulatory obligation.
- Provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for such activities.
- Debug software to identify and repair errors that impair existing intended functionality.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.).
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

HOW TO EXERCISE YOUR CCPA RIGHTS

If you are a California resident, you may exercise your CCPA-provided rights described above by either:

- Visiting info@connectuswealth.com; or
- Calling us at (646) 560-4000.

Also, we are not obligated to respond to more than two access requests for the same individual's personal information within a 12-month period.

VERIFICATION OF CONSUMER REQUESTS

Each verifiable consumer request must provide sufficient information to allow us to reasonably verify that you are the person about whom we collected Personal Information or an authorized agent. We cannot respond to your request if we cannot verify and confirm your identity or authority to make the request.

RESPONSE TIMING AND FORMAT

We intend to respond to a verified consumer request within 45 days of our receipt. If we require additional time to respond, we will inform you of the reason for additional time needed and anticipated timing for our response. Our response will also explain why we cannot comply with your request, if applicable.

SHINE THE LIGHT

California law permits residents of California to request certain details about how their information is shared with third parties for direct marketing purposes. The Firm does not share Personal Information with third parties for their direct marketing purposes.

CONTACT US

You are encouraged to review this Notice regularly, as we may change it from time to time. If we make changes, we will notify you by revising the date at the top of the Notice and, in some cases, provide you with additional notice (such as adding a statement to our website homepage or sending you a notification).

If you have any questions about this Notice, please contact us at:

20 Wight Avenue, Suite 155, Hunt Valley, MD, 21030
info@connectuswealth.com
(646) 560-4000