

As part of Watts Gwilliam & Company's commitment to client trust, the confidentiality of personal information is paramount. We maintain high standards to protect personal information. We will remain vigilant in protecting that information and in using it in a fair and lawful manner.

This Pledge explains our privacy commitment. It describes the personal information that we collect and hold, and describes how we use, share and secure it. Covered by the pledge is the personal information of current and former Watts Gwilliam & Company clients, as well as prospective clients who offer personal information to Watts Gwilliam & Company as part of a potential client engagement.

In this pledge, "personal information" refers to any information relating to an identified individual, or any "nonpublic personal information"¹.

WHAT INFORMATION DO WE COLLECT AND HOW DO WE COLLECT IT?

Based on our relationship with you, we collect personal information from and about you that is adequate, relevant, and appropriate under the circumstances. This information is collected from different sources, including, but not limited to, applications, forms, communications and other interactions. This information may include your name, address, e-mail address, telephone number, social security number or other identification number, income, financial goals, interests, sources of funds, and investment objectives.

HOW DO WE USE PERSONAL INFORMATION?

We use personal information to operate our business in a prudent and efficient manner. This may include, depending on the nature of your relationship with us, using it to evaluate financial needs; deliver integrated financial services; process and service transactions; respond to inquiries and requests; fulfill our obligations to you; work with your other financial, legal, insurance, and tax advisors; resolve disputes; prevent fraud; and perform risk control.

WHAT PERSONAL INFORMATION DO WE SHARE EXTERNALLY WITH NONAFFILIATED THIRD PARTIES AND WHY DO WE SHARE IT?

Watts Gwilliam & Company does not rent or sell personal information. We do not allow for the buying, selling, or sharing of client data gathered for text messaging. In connection with the uses described above, we may, depending on the nature of your relationship with us, transfer some or all of your personal information to nonaffiliated third parties. These nonaffiliated third parties may be financial service providers (such as securities broker-dealers, banks or insurance companies) or others (such as professional services organizations, regulators, professional associations or other service providers). Among other things, these nonaffiliated third parties (a) help us carry out and finalize transactions; (b) provide us with consulting, accounting, legal and other services; and (c) help us develop, prepare and maintain our services and systems. Information may be provided to professional organizations, regulators, or others, to explain advice given to clients.

HOW DO WE PROTECT CLIENT CONFIDENTIALITY AND SECURITY OF INFORMATION?

We educate our members and employees to treat personal information with care, and work to limit access to this information to individuals who need it for purposes stated in this pledge. We maintain and monitor our physical, electronic and procedural safeguards, updating them as needed so that we may protect personal information. We take such technical and organizational security measures, as we deem appropriate, to keep personal information confidential and secure against authorized or unlawful processing, and to prevent loss, destruction or damage. We endeavor to keep our information current and complete. Information is kept only for so long as is necessary for business purposes or to meet legal and regulatory requirements. If, at any time, you become aware of any discrepancies in your personal information, please notify us and we will make the necessary corrections.

¹ As defined under the U.S. Gramm-Leach-Bliley Act. This generally includes, but is not limited to, nonpublic information that you provide to us or that we obtain about you in connection with the client relationship.

