

## PRIVACY NOTICE REGARDING CLIENT PRIVACY

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Chatterton & Associates, The Wealth Management Team, Inc.

### Changes to this Policy

We may revise this policy at our discretion and will update it periodically. Your continued use of our websites and services after changes have been posted will constitute your acceptance of this Privacy Policy and changes

**Information We Collect:** In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you.

For purposes of this policy, “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 consumer or household. It does not include de-identified or aggregate information, or public information lawfully available from governmental records.

Below we categorize types of personal information we have collected or will collect from you during our relationship. We may continue to collect these types of personal information and use it for the purpose listed further below. Please note that the examples of the types of information within these categories that may qualify as personal information are not intended to be comprehensive and that there may be overlap between categories.

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### Categories of Personal Information

- **Contact information and other personal identifiers**, such as name, postal and email address, phone number, unique personal identifier, account name, registration number, tax identification number, Social Security number, driver’s license number, passport number, and similar identifiers
- **Financial, commercial and benefits information**, such as records and information about personal property or financial accounts, investments, products, and services, purchasing; investment objectives, risk tolerance, time horizon, assets, holdings and financial interest, income and compensation, expenses, tax information, transaction history, investment experience; other

account information; information on savings, insurance, and retirement; other benefits related information; and other commercial and financial information

- **Internet or electronic activity information and device and online identifiers**, such as IP address, online identifier or device ID, or other similar identifiers; information regarding interaction with a website, device, database, or application, including time and duration of internet and network connections; browsing history; and calls and emails sent and received
- **Demographic, protected classification, and association information**, such as date of birth/age, gender, marital status, citizenship and visa status, military or veteran status; association-related information, such as whether an individual is related to someone who is employed in the securities industry, information about dependents, beneficiaries, and parties related to an account, trusted contact person(s); and disability and health-related information
- **Audio, electronic, visual or similar information**, including photographs, CCTV footage and other video event recordings, and voicemail.
- **Inferences drawn from personal information** to create a profile in relation to preferences, credit history, risk tolerance, and investment strategies
- **Other personal information provided to us or stored on our systems**, such as information provided by email or in a phone call

**How We Use Information:** Information may be used among the Non-Affiliated companies that perform support services for us, such as data processing, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To process your requests** such as securities purchases and sales
- **To help you establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you
- **To service your accounts**, such as conducting transactions, communicating, fulfilling requests and responding to questions, providing information and events, providing financial advice, conducting administrative and managerial tasks associated with our client services
- **To supervising** and provide compliance and educational support to Advisors
- **To comply** with Federal, State, and Self-Regulatory Organization requirements; and
- **To keep you informed** about financial services of interest to you
- **To protect your accounts** from unauthorized access or identity theft, ensuring the security and sufficiency of our networks, systems, services, property and personnel, monitoring, assessing, designing and improving our operations and managing risk

**Categories of Information We Disclose:** We may disclose all information that we collect as required by law. Chatterton & Associates and its affiliates do not sell customer lists and will not sell your name to telemarketers.

**Categories of Parties to Whom We Disclose:** We will not disclose information regarding you or your account with us, except under the following circumstances:

- To your authorized Advisor and his or her manager
- To our Broker/Dealer that our Advisors are associated with and the Broker/Dealer's affiliates, to the extent required and/or permitted by law
- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company
- To consumer reporting agencies
- To third parties who perform services or marketing on our behalf
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity with your written approval
- To our attorneys, accountants or auditors
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries;
- We may disclose non-public personal information about you in connection with the transfer of your account to another financial institution at your request or the request of your advisor. If you do not want Chatterton & Associates to disclose your non-public personal information with your advisor's new financial institution, please contact us as directed below
- Other parties to which you direct us to disclose personal information

#### **Sources of Personal Information**

We collect or receive the categories of personal information above from:

- Communications and interactions with individuals seeking to obtain or using our products and services or their agents and representatives, or other persons communicating or otherwise interacting with us
- Automated collection through our Sites, services, products, applications, databases, devices, information systems and networks, including through cookies and similar technology
- Other financial institutions, product sponsors, clearing firms, intermediaries, business partners and contacts
- Service providers, contractors, vendors,
- Subscription information, research and analytic services

- Public and government sources and records
- Records and property to which we have lawful access, e.g., device inventories for company property or documents stored on our systems

## **Marketing and Website Analytics**

### **Cookies and Marketing**

We may use data collected from our websites to make you personalized offers relating to our services, either on our websites or on third-party sites that you visit through the use of cookies and similar technologies in conjunction with other entities (e.g., Google Ads and social media partners). A cookie is a file with a small amount of data that is sent to your browser from a web server and stored on your device. If you are interested in learning more about online behavioral advertising, or opting out of this type of advertising, we encourage you to visit one of the advertising industry-developed opt-out pages, such as <https://youradchoices.com/> or [https://aboutads/info](https://aboutads.info). (Note, however, that these and other links we provide in this policy to other entities' sites are sites over which we have no control.) For more information on GoogleAds, and the information Google collects through this service and cookies as may be amended from time to time, please refer to the Google links below.

### **Analytics**

Our websites may also use cookies to track website behavior and place cookies that may allow us to connect that information to other information that we have about you and track how visitors access or view our websites. We use this information to understand what pages and features of our websites visitors find useful. We use Google Analytics for this purpose. For more information about Google, the information it collects, and Google Analytics' Opt-Out Browser Add-On, please visit:

- <https://policies.google.com/privacy>
- <https://policies.google.com/technologies/partner-sites>;
- <https://tools.google.com/dlpage/gaoptout/>

### **Do Not Track Requests**

Currently there is no industry standard for "Do Not Track" signals, which are options on your browser that tell website operators that you do not wish to have online activity tracked. Because there is no industry standard concerning what, if anything, websites should do when they receive such signals, we currently do not take action in response to these signals

### **Sales of Information**

We do not and will not sell personal information, nor have we sold any of the categories of described above

**Regulation S-ID:** Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to customers or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect potential red-flags to prevent and mitigate identity theft.

**Our Security Policy:** We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

**Closed or Inactive Accounts:** If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you. Individuals may also request that we delete personal information. Upon receiving and verifying such a request, Chatterton & Associates will delete the personal information unless the information is necessary for Chatterton & Associates to:

- Complete the transaction for which we collected the information
- Provide you with the good or service that you requested
- Detect security incidents

### **How We Protect Personal Information**

Chatterton & Associates is committed to the security of your personal information. To protect personal information from unauthorized access and use, we implement and maintain reasonable security measures that are intended to maintain the confidentiality of personal information. However, no security measures are infallible and we cannot and do not guarantee that our safeguards will always work. Please always use caution when transmitting information, including over the internet, use strong and unique passwords that you do not also use on other online services, and notify us immediately of any concerns regarding your account or passwords.



3061 E. La Palma Ave  
Anaheim, CA 92806  
714-572-2050

**Changes to This Privacy Policy:** If we make any substantial changes in the way we use or disseminate confidential information, we will notify you.

**Contact Information:** You may notify us of any questions or concerns, by one of the following methods:

- **Mail**  
Chatterton & Associates, The Wealth Management Team, Inc.  
3061 E. La Palma Ave.  
Anaheim, CA 92806
- **Telephone**  
(714) 572-2050
- **Email**  
bradley@chattertoninc.com