



NOTICE OF PRIVACY PRACTICES - 2020

Wheels Up Wealth, Inc. recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. Wheels Up Wealth, Inc. will not disclose your personal information to anyone unless it is required by law or with your authorization. We will not sell your personal information. Wheels Up Wealth, Inc. will provide this privacy statement to all clients annually.

We want our clients to understand what information we collect, how we use it, and how we protect your personal information.

Why We Collect Your Information

We gather information about you so that we can:

- Help design and implement the investment and planning related services we provide you;
- Manage your accounts with the Custodian or third parties for accounts 'held away' (if applicable); and,
- Comply with the Federal and State laws and regulations that govern us.

What Information We Collect and Maintain

We may collect the following types of "nonpublic personal information" about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information.
- Information that we generate to service your financial needs.
- Information that we may receive from third parties with respect to your financial profile.
- Information necessary to manage your accounts with the Custodian or third party accounts 'held away' (if applicable.)

What Information We Disclose

We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. For example, in order for us to provide planning or investment management services to you, we may disclose your personal information in limited circumstances to various service providers, such as our Custodian in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.

Otherwise, Wheels Up Wealth, Inc. will not disclose any personal information about you or your account(s) unless one of the following conditions is met:

- We receive your prior written consent; or
- We have documentation that the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient



Arrangements with companies or independent contractors not affiliated with Wheels Up Wealth, Inc. will be subject to confidentiality agreements.

How We Protect Your Personal Information

Privacy has always been important to Wheels Up Wealth, Inc.. We restrict and limit access to client information only to those who need to carry out their business functions. We educate employees about safeguarding client information and preventing its unauthorized access, disclosure, or use. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information.

Changes to this Privacy Policy

If we make any material change to the way we use or disseminate confidential information, we will notify you of such changes in writing.