

PRIVACY POLICY NOTICE

CERITY PARTNERS LLC and CERITY PARTNERS RETIREMENT PLAN ADVISORS LLC

Cerity Partners LLC, and its subsidiary Cerity Partners Retirement Plan Advisors LLC, recognize the importance of protecting the privacy of our clients. Protecting your privacy is fundamental to the way we conduct business, whether over the Internet, over the telephone, or in our offices. We want you to know what information we collect and how we use and safeguard that information.

WHAT INFORMATION WE COLLECT

We collect certain personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

WHAT INFORMATION WE DISCLOSE

We do not disclose the personal information we collect about our Clients to anyone except: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law.

We are permitted by law to disclose the personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose. If you decide at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

SECURITY OF YOUR INFORMATION

We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards.

CHANGES TO OUR PRIVACY POLICY OR RELATIONSHIP WITH YOU

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.

QUESTIONS

If you have any questions or concerns regarding this notice, please contact your advisor or email us at privacy@ceritypartners.com.

**Notice of Collection -- California Residents
California Consumer Privacy Act of 2018**

This Notice of Collection for California Residents (“Notice”), which is provided by Cerity Partners LLC, and its subsidiary Cerity Partners Retirement Plan Advisors LLC, (together “Cerity Partners”, “we” or “our”) pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), applies to the Personal Information of California residents (“consumer,” “you,” or “your”) collected by Cerity Partners in connection with the services we provide to you. If you reside outside the State of California, this Notice does not apply to you. Capitalized terms have the meaning set forth in this Notice or the CCPA, as applicable.

A. Categories of Personal Information Collected

Cerity Partners collects or has collected the following Categories of Personal Information from or about you in connection with the potential or actual services you receive from Cerity Partners.

- **Identifiers.** A real name, postal address, unique personal identifier, online identifier, IP address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.
- **Categories of Personal Information Listed in Cal. Civ. Code § 1798.80(e).** A name, signature, Social Security number, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, or any other financial information. Some Personal Information included in this category may overlap with other categories.
- **Protected classification characteristics under California or federal law.** Age (40 years or older), citizenship, marital status, sex (including gender), veteran or military status.
- **Commercial Information.** Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- **Internet or other similar network activity.** Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
- **Audio, electronic, visual, or similar information.**
- **Professional or employment-related information.** Current or past job history or performance evaluations
- **Non-public education information.** Education records directly related to a student maintained by an educational institution or party acting on its behalf.
- **Inferences.** Inferences drawn from any of the information identified above to create a profile about a potential investor.

B. Business Purpose

We collect each category of your Personal Information listed above for the following business or commercial purposes: (i) to conduct our business, including providing our services, where necessary, in order to assist us in verifying your identity, (ii) to fulfill and respond to your inquiries and requests, and to otherwise carry out the purposes for which you provided the information, (iii) for distribution of our marketing materials, (iv) to help maintain the safety, security, and integrity of our business, including all systems and services, and (v) to establish customer relationships and to communicate with customers.

C. Additional Business Purposes

We may also use or disclose any Category of Personal Information for one or more of these additional Business Purposes: (i) compliance with applicable laws, judicial or administrative orders, and responding to law enforcement requests; (ii) restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, where Personal Information is transferred; and (iii) exercise of our legal rights and protection of our interests in connection with any claim, action or proceeding brought by or against us.

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D. Contact

For additional information relating to the collection and processing of your Personal Information, please review our CCPA Notice to California Residents at <https://ceritypartners.com/ccpa-notice/>. If you have any other questions or comments please contact us by email at privacy@ceritypartners.com or by phone at 1-866-906-0929.