



## PRIVACY POLICY NOTICE

1776 Wealth LLC has adopted this privacy policy with recognition that protecting the privacy and security of the personal information we obtain about our clients is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information.

**Information We Collect:** We collect certain nonpublic information about you ("Client Information"). The essential purpose for collecting Client Information is to allow us to provide investment advisory services to you. Client Information we collect may include:

- Information that you provide on applications or other forms. This Client Information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account, and other records concerning your financial condition and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages, and tax returns.
- Identifying information such as your name, age, address, social security number, etc.
- Information about your transactions with us, or others (e.g., broker-dealers, clearing firms, or other chosen investment sponsors).
- Information we receive from consumer reporting agencies (e.g., credit bureaus), as well as other various materials we may use to provide an appropriate recommendation or to fill a service request.

**Security of Your Information:** We restrict access to your nonpublic personal information to those Supervised Persons who need to know that information to service your account. We maintain physical, electronic, and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

**Information We Disclose:** We do not disclose the Client 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 authorized services (such as broker-dealers,

custodians, independent managers etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, consultants, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law.

We are permitted by law to disclose the nonpublic 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.

**Former Clients:** If you decide to close your account(s) or become an inactive client, we will adhere to our privacy policies, which may be amended from time to time.

**Changes to Our Privacy Policy:** In the event there were to be a material change to our privacy policy regarding how we use your confidential information, we will provide written notice to you. Where applicable, you would be given an opportunity to limit or opt-out of such disclosure arrangements.

**California Residents:** The California Consumer Privacy Act “CCPA” applies to those clients who reside<sup>1</sup> in California.

Within the course of business, 1776 Wealth collects Client Information regarding information from applications or other forms, identifying information, information from your transactions with 1776 Wealth, and information from consumer reporting agencies, as outlined above. Upon request, 1776 Wealth shall provide: (i) the categories of personal information that have been collected; (ii) the categories of sources from which the personal information is collected; (iii) what the business or commercial purpose is for the collecting or selling of personal information; (iv) the categories of third parties that the business shares personal information with; and (v) the specific pieces of personal information that have been collected about that consumer.

Your Client Information will only be disclosed to outside entities under the delineated exceptions outlined in the “Information We Disclose” section above or under any of the exceptions listed in the CCPA. None of your Client Information is sold to anyone or accessible by anyone other than the necessary Supervised Persons of 1776 Wealth.

Under the CCPA, California residents have a right to request the deletion of their personal information, unless that information is necessary for the business to: (i) complete the transaction requested by the California resident for which the personal information was collected; (ii) engage in internal uses

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<sup>1</sup> For purposes of the CCPA, a California resident is someone who is domiciled in California. This can include either (i) someone who typically resides in California but is on vacation elsewhere or (ii) someone temporarily domiciled in California for work.

reasonably aligned with the expectations of the California resident based on their relationship with the business; or (iii) otherwise use the personal information in a manner consistent with the context that the information was provided. As the use of your Client Information meets all of these exceptions, 1776 Wealth cannot guarantee that all Client Information collected in the course of business can be deleted upon request.

Clients who invoke their rights under the CCPA will not be discriminated against.

1776 Wealth will comply with all other provisions of the CCPA.

**Questions:** If you have questions about this privacy notice or about the privacy of your Client Information, please contact our main number (678)257-2730 or 1776 Wealth's Chief Compliance Officer at [john@1776Wealth.com](mailto:john@1776Wealth.com).