

**Sanitas Wealth Management, LLC**

**Privacy Policy**

**Exhibit B to Policies Manual**

**Effective March 2019**

## **1. Introduction**

As we develop our relationship with clients, it's necessary that we collect and share personal client information with affiliates and key service providers in-order-to manage your accounts. Protecting your privacy is important to us and we want you to know how we treat your nonpublic personal information.

This document explains the Privacy Policy<sup>1</sup> of Sanitas Wealth Management, LLC ("SWM") and our affiliates concerning the privacy interests of our clients. SWM is an investment adviser registered with the State of Colorado. SWM's principal business is to act as an investment adviser to its clients.

The policy of SWM is to protect the confidentiality, integrity and security of any nonpublic personal information of its clients and prospective clients, and to prevent unauthorized access to, or the use or disclosure of such information. As we accept new clients who complete a client agreement and custodian forms, etc., we collect nonpublic personal information for purposes of conducting our business. Any and all such nonpublic personal information is hereinafter referred to as "nonpublic personal information." For convenience, "you" or "your" refers to any and all clients described above and "we," "our" and "us" refers to SWM throughout this document.

## **2. Our Commitment to You**

We are committed to safeguarding the use of your nonpublic personal information. We protect the security and confidentiality of the nonpublic personal information we have collected and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account and our funds or in furtherance of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your nonpublic personal information, and we do everything we can to maintain that trust.

Importantly, we do not sell your nonpublic personal information to anyone. We only provide such information to others in connection with the servicing and management of your account and managing our funds or to communicate with you about financial planning and investment related concepts.

## **3. Definitions**

### **Affiliates**

Companies related by common ownership or control. They can be financial and non-financial companies. We only share your nonpublic personal information with affiliates in connection with the servicing and management of your account and managing our funds. We currently do not have affiliates.

### **Non-Affiliates**

Companies not related by common ownership or control. They can be financial and non-financial companies. We do not share your nonpublic personal information with non-affiliates except as described in this notice.

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<sup>1</sup> As required by Title V of the Gramm-Leach-Bliley Act and United States Securities and Exchange Commission ("SEC") Regulation S-P (17 CFR 248.1 – 248.30)

## Joint Marketing

A formal agreement between non-affiliated financial companies that together market financial products or services to you. We do not engage in joint marketing.

## 4. Nonpublic Personal Information Collected

SWM collects (or may collect) the following types of nonpublic personal information in-order-to conduct our business and manage our funds:

1. Information you provide in connection a managing your client accounts, such as your name, address, social security number, tax ID number, assets, income, investment objectives, financial situation and debt. This information is obtained (or may be obtained) in writing, in person, by telephone, electronically or by any other means;
2. Information we obtain (or may obtain) for the purpose of tax reporting to you and to the various agencies to which we report as required by law, including disclosures on various Internal Revenue Service (“IRS”) forms;
3. Information that relates to your account balance, capital contributions, redemptions and distributions, and any other transactions which we provide investment advisory services or investment management services;
4. Information from affiliated and non-affiliated third parties pursuant to law, rules, regulations, standard securities industry practice and/or legal process, including information and/or documents received, shared, produced or provided in connection with a subpoena, discovery request or other legal process compelling production;
5. Information from affiliated and non-affiliated third parties related to servicing your account for purposes of providing investment management services.

## 5. Nonpublic Personal Information Disclosed to Affiliates and Non-affiliated Third Parties

We disclose to affiliates and non-affiliated third parties nonpublic personal information only in connection with us providing investment management services or in respect of conducting our investment advisory business, or in communications for furtherance of our relationship with you. Such disclosures include, among other things, information related to transactions, settlement, billing, payment, processing, clearing, transferring, reconciling, collection and tax reporting. Such disclosures may be provided to affiliates and non-affiliated third parties:

- As required or necessary to carry out fully and properly our business such as:
  - a. Disclosures to affiliated and non-affiliated third-party service providers who supply us with computer related services including data maintenance, document processing and delivery, software for financial planning, and contact management or communications services;
  - b. Processing services, and disclosures to affiliated and non-affiliated third parties such custodians, administrators, accountants, auditors, legal firms, etc.;
- As required by law or legal process;
- With your consent. Your consent to share nonpublic personal information can be collected in writing via e-mail, or more formally via a signature on an Authorization to Provide Personal Information.

## Current Non-Affiliated Third Parties Where Nonpublic Personal Information May be Shared

- Microsoft Office 365 - SWM utilizes this system as a cloud based server to store electronic files and archive electronic communications for regulatory purposes. Office 365 hosts the exchange server for our e-mail system utilizing Microsoft Outlook.
- Junxure – This is our Client Relationship Management system where contact notes and a duplicate archive of e-mail communications are stored.
- eSignLive – This is the e-Signature system utilized by SWM for signatures on agreements and authorizations and to confirm receipt of regulatory disclosures.
- FMG Suite – This system provides for client communications of articles and relevant financial planning or investment related content. The system is utilized for social media postings as well as client and prospective client e-mails which market services available through SWM in furtherance of client relationships or to establish new client relationships. Nonpublic Personal Information shared with FMG Suite is limited to your name, contact information, gender, marital status, date of birth and client anniversary date.
- eMoney Advisor – This is the primary financial planning tool utilized by SWM in generating financial planning analysis and recommendations. The tool stores documents uploaded by clients in an encrypted vault, as well as information to link accounts if clients choose to set up account aggregation.
- QuickBooks and QuickBooks Pay – This is the bookkeeping solution used by SWM as well as our invoicing system.
- TradePMR Fusion and Wells Fargo Clearing Services “WFCS”– TradePMR is our introducing broker/dealer and intermediary to Wells Fargo Clearing Services. As such, TradePMR has access to client account information as documented through brokerage and affiliated accounts and transactions, as does WFCS as ultimate custodian.
- The list above is not exhaustive. Clients may authorize specific disclosure of nonpublic personal information to be used by SWM to quote services and products available through non-affiliated third parties (ex. Life insurance, property and casualty insurance, legal services, etc.). SWM expects to update the list above if additional non-affiliated third party solutions are utilized.

## 6. Former Clients

Except as required to continue the management of client accounts or comply with regulatory books and records requirements, we will disclose nonpublic personal information about former clients of our investment advisory and investment management business only as permitted and/or required by law or legal process, or with the former client’s consent.

## 7. When You Can Limit Sharing

Federal law gives you the right to limit the sharing of your nonpublic personal information, when: (1) sharing is for affiliates' everyday business purposes, (2) sharing with affiliates is done to use your information to market to you, and (3) sharing with non-affiliates is done to use your information to market to you. We share information under #1 above, and you cannot limit such sharing as it is necessary to provide the services for which you have engaged SWM. To limit sharing under #1, you must terminate your engagements with SWM. We do not share information under #2 above. We share information under #3 above by using services for communications of things such as newsletters, topical articles or videos, or other information which can be either informational or construed as marketing with intent to broaden our engagement. Generally, you can opt out of information sharing under #3 by clicking on the

“Unsubscribe” link on such communications. Such change in your subscription preference will note your change of status in the non-affiliated contact management system. It may not change your status for direct communications from SWM. State laws and individual companies may give you additional rights to limit sharing.

## **8. Confidentiality and Security of Nonpublic Personal Information**

We are committed to implementing and maintaining commercially reasonable and appropriate measures to maintain your nonpublic personal information in a secure and confidential fashion. Our information security procedures include, but are not limited to, the following features:

1. Access controls on customer information systems, including controls to authenticate and permit access only to authorized individuals, and controls to prevent our employees from providing nonpublic personal information to unauthorized individuals;
2. Physical access restrictions at locations such as buildings, computer facilities, and record storage facilities, in-order-to restrict access of nonpublic personal information to unauthorized individuals;
3. Segregation of duties for our employees with responsibilities necessitating access to nonpublic personal information;
4. Response programs that specify actions to be taken when we suspect or detect that unauthorized individuals may have gained access to nonpublic personal information;
5. A disaster recovery plan to protect against loss or damage to nonpublic personal information due to potential hazards, such as fire and water damage or technological interruption or failure.

## **9. Maintenance of Records**

Nonpublic personal information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of record retention, we anticipate continuing to maintain the legacy records, unless you specifically request that such information be destroyed or deleted.

## **10. Notice to Clients**

We will send you notice of our Privacy Policy upon executing a client agreement, and annually if there are any changes to our policy, for as long as you are an investor. Periodically we may revise our Privacy Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy.

## **11. Opting Out**

Section 502(a) of the G-L-B Act generally prohibits a financial institution, directly or through its affiliates, from sharing nonpublic personal information with a non-affiliated third party unless the institution (i) provides the consumer with a notice of the institution's privacy policies and practices, (ii) provides the consumer with a clear and conspicuous notice that the consumer's nonpublic personal information may be disclosed to non-affiliated third parties, (iii) gives the consumer an opportunity to opt out of that disclosure, and (iv) informs the consumer how to opt out.

Clients cannot opt out of allowing SWM to share their nonpublic personal information with non-affiliated third parties which are necessary to service their accounts such as Custodians, Asset Managers, Subadvisers, trade processing providers or certain software vendors. Clients can opt out of allowing SWM to share their nonpublic personal information with non-affiliated third parties where the purpose is communication or marketing of SWM services by clicking the “Unsubscribe” link in such communications. Currently, the option to opt out is limited to communications from FMG Suite. We do not share client information with any third parties to market services offered by those parties and limit such sharing to communications services on behalf of SWM. .

## **12. Requests for Information**

Anyone may request a copy of our Privacy Policy or procedures by contacting our Chief Compliance Officer, Jaco Jordaan, either by email at [jaco@sanitaswealth.com](mailto:jaco@sanitaswealth.com) or in writing at:

SWM Wealth Management, LLC  
Attn: Compliance Department  
4845 Pearl East Circle, Suite 101  
Boulder, CO 80301

## **PRIVACY NOTICE**

SWM Wealth Management, LLC (“SWM”) adopted this policy with recognition that protecting the privacy and security of the nonpublic 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 nonpublic personal information about you. We want you to know what information we collect and how we use and safeguard that information.

### **WHAT INFORMATION WE COLLECT**

We collect certain nonpublic personal information about you (such as your name, address, social security number, etc.) that you provide on client or subscription agreements, custodian or brokerage 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 accounts with us in-order-to manage your accounts.

### **WHAT INFORMATION WE DISCLOSE**

SWM does not disclose the nonpublic personal information we collect about our clients to anyone except: (1) in furtherance of our business relationship with clients and prospective clients, and then only to those persons necessary to effect the transactions and provide the services that clients authorize (such as broker-dealers, administrators, custodians, independent managers, etc.), or services that provide communications systems and content that allows SWM to provide relevant or topical financial planning or investment management content; (2) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (3) our attorneys, accountants, and auditors; or (4) 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 services on our behalf). These third parties are prohibited to use or share the information for any other purpose. If you decide to either terminate our services or become an inactive client, we will continue to adhere to our Privacy Policy, as may be amended from time to time.

### **SECURITY OF YOUR INFORMATION**

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account, or in the event of a Significant Business Disruption, to the individual authorized to communicate with clients under SWM’s Business Continuation Policy. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

### **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.

### **OPTING OUT**

Clients cannot opt out of allowing SWM to share their nonpublic personal information with affiliated or non-affiliated third parties which are necessary to service their accounts. Clients and prospective clients can opt out of sharing their nonpublic personal information with non-affiliated third parties which are not necessary to service their accounts or required by regulation. Opting out currently is only available for information shared with FMG Suite.

### **REQUESTS FOR INFORMATION**

For a copy of our Privacy Policy, please contact Jaco Jordaan at Sanitas Wealth Management, LLC, Compliance Department, 4845 Pearl East Circle, Suite 101, Boulder, CO 80301, 303-325-7945 or [jaco@sanitaswealth.com](mailto:jaco@sanitaswealth.com)