

Privacy Policy

Effective: 1/3/2024

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment adviser firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to non-affiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure.

To conduct regular business, Aptus Financial may collect personal information such as:

- Excel data sheets for each client with pertinent financial planning information.
- Supporting documents, including investment statements, paystubs, bank statements, student loan information, mortgage statements, 529 statements. We ask our clients to redact personal information from the documents and send electronic copies via secure document upload. Clients can also send hard copies via mail or courier. As a matter of policy, we delete and shred all submitted documents when our associated planning work is finished.
- Aptus-developed financial models used in the financial planning and investment advisory process.

Other than information shared <u>internally</u> (within Aptus) to help improve service to our clients, Aptus does not foresee any situation in which it would share client information except as required by law, such as to government entities or other third parties in response to subpoenas.

No Aptus information, of any kind, from any source, will <u>ever</u> be shared or sold to third parties/affiliates for marketing/promotional purposes.

If there were to be a change in this policy, Aptus Financial will provide clients with written notice and clients will be provided an opportunity to direct Aptus Financial as to whether such disclosure is permissible.