



Last Updated 03.28.2024

## **Privacy Policy Notice and SMS/Text**

### **Privacy Policy**

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of client information. Federal law gives clients the right to limit some but not all sharing of your Personal Information. In situations where a financial institution does disclose client information to nonaffiliated third parties, other than permitted or required by law, clients must be given the opportunity to opt out or prevent such disclosure.

**The Short Message Service (SMS) Privacy Policy is a subset of our overall Privacy Policy and addresses how Cincinnati Wealth Management, Inc. handles the confidentiality of information related to SMS communications that come directly from Cincinnati Wealth Management, Inc. Please see our SMS/Text Policy.**

### **Commitment to Your Private Information**

Cincinnati Wealth Management, Inc. ("CWM") recognizes that our relationships with current, former, and prospective clients are based on integrity and trust. We are committed to safeguarding the confidential information of its current, former, and prospective clients. CWM holds all Personal Information provided by clients in the strictest confidence and it is the objective of the firm to protect the privacy your privacy. CWM will not sell your Personal Information nor disclose your Personal Information to anyone unless it is required by law or at your direction.

## **Personal Information CWM Collects**

CWM collects non-public Personal Information, to the extent of the law, about its clients and/or prospects from the following sources.

- Account Applications and other forms, which may include name, address, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information.
- Social security, number or tax identification number, total assets, income, and accounts at other institutions.
- Account history, which may include information about the transactions and balances in accounts with CWM and/or other institutions.
- Verification information you or a consumer reporting agency, may supply us to identify you in connection with a financial product or service, such as your demographic information, investment preferences, location information, or financial information; and
- Correspondence, which may include written, telephonic, or electronic communications.

## **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.
- Provide information, products, or services you requested.
- Enforce our Terms of Use and any other agreements between you and CWM.
- Detect and prevent fraud or other criminal activities.
- Comply with the Federal and State laws and regulations that govern us.
- To improve your website experience by remembering your preferences and repeat visits.

## **How We Handle and Share Personal Information, Permitted under Law**

As emphasized above, CWM does not sell Personal Information about current, former, or prospective clients to third parties. CWM restricts access to your personal and account information to employees who provide services to you;

**We may share your non-public Personal Information, for example:**

- With service providers who are authorized to use your Personal Information only as necessary to support our business operations, such as those who provide data storage, payment, custodial, technology support and services, client service, risk solution provision, analytics, and fraud prevention.
- In order to complete certain transactions or account changes that a client directs, it may be necessary to provide certain non-public Personal Information about that client to companies, individuals, or groups that are not affiliated with CWM. For example, if a client asks CWM to transfer assets from another financial institution, CWM will need to provide certain non-public Personal Information about that client to the company to complete the transaction.
- With government entities, consumer reporting agencies or other third parties in response to subpoenas

In all such cases, CWM will provide the third party with only the information necessary to carry out its assigned responsibilities and only for that purpose. In addition, CWM requires these third parties to treat CWM clients' non-public information with the same high degree of confidentiality that CWM does.

## **How We Safeguard Personal Information**

CWM seeks to protect Personal Information by implementing and maintaining reasonable physical, electronic, and procedural security measures and safeguards designed to protect Personal Information within our organization. CWM provides employee training in the proper handling of Personal Information.

Although we cannot fully disclose all that we do to protect the personally identifiable information of our clients, here are just a few measures we take:

- We employ strong authentication and password protocols.
- We enforce inactivity timeouts on our computers.
- We maintain and regularly test our firewalls.
- We continuously update our anti-virus and anti-malware protection.
- We employ threat monitoring/intrusion detection.
- We utilize encryption to protect our client and employee data.
- We have mandatory training for all employees.

## **Cookie Policy**

CWM use cookies, pixels, and other tracking technologies for various purposes, such as monitoring our marketing campaign performance. CWM also uses third-party analytics services (like Google Analytics) to gather this information for analysis.

A cookie is a small file that a website transfers to your computer to allow your browser to remember information about your session on that website. They are typically one-pixel, transparent images located on a webpage or in an email —or similar technologies may be used.

They may also be used when you are served advertisements, or you otherwise interact with advertisements outside of our online services. These are principally used to help recognize users, assess traffic patterns, and measure site or campaign engagement.

CWM' site temporarily stores certain information about your visit to help us to better align our content and the website design with your needs. The information these cookies collect includes, but is not limited to:

- Your computer's IP address
- The date and time you accessed the site
- The Universal Resource Locators (URLs) of the pages you visit on our website
- The domain and/or URL of the site you came from, if you clicked a link there that brought you to our website

We may share this information internally or third-party contractors as needed. This information is only used to improve the website and enhance our visitors' experience.

## **Links to Other Websites**

This site may contain links or references to other Web sites. Please be aware that we do not control other Web sites and that, in any case, this Privacy Policy does not apply to those Web sites. We encourage you to read the privacy policy of every Web site you visit. We are not responsible in any way for the content of such Web sites.

## **Children**

Our web site is not directed to children under the age of 18 years. By using our website, you represent and warrant that you are at least 18 years old. We respect the privacy of children and do not knowingly collect or retain personally identifiable information or non-public information from children under the age of 18 through our web site. However, we may process non-public information, on a child's behalf, with permission from the parent or guardian. To the extent we have unintentionally collected any non-public information on

our website from a person under the age of 18 years old, you may request and obtain removal of this non-public information. You may make such a request by emailing us at [ron@cincinnatiwealth.cc](mailto:ron@cincinnatiwealth.cc).

Your request must provide information to us that enables us to verify your identity and, as applicable, of your authorized representative, in order for us to respond to your request. Upon receiving a request pursuant to this Policy, we will confirm receipt within 10 days and provide you with information about how we will verify and process the request. We will take reasonable steps to verify your identity (or the identity and authority of your authorized representative) prior to responding to your requests. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

### **Former Clients**

Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you, and we will continue to treat your non-public information with strict confidentiality.

### **Notice to Persons Accessing CWM' website Outside the United States**

If you access CWM' website outside the United States, any information you provide to us through the CWM' website will be transferred out of that jurisdiction and into the United States. If you do not want your personally identifiable information to leave that jurisdiction, do not provide the information to us. By providing personally identifiable information to us, you explicitly consent to the transfer of your information to the United States.

### **Residents of California**

Under the California Consumer Privacy Act of 2018 (the "CCPA") and The California Privacy Rights Act (the "CPRA"), also known as Proposition 24, California residents have certain rights around CWM' collection, use and sharing of their personal information. CWM' California Privacy Policy Notice may be found on our website: [cincinnatiwealth.cc](http://cincinnatiwealth.cc).

### **Changes to this Privacy Policy Notice**

CWM will provide each client with an initial notice of the current Privacy Policy Notice when the client relationship is established. Additionally, CWM may occasionally amend this Privacy Policy Notice at any time. If we decide to use Personal Information in a manner that is materially different from that stated at the time it was collected, we will notify you of such changes prior to implementing them by posting a revised Privacy Policy Notice with a

new “Last Updated” date. CWM shall also provide each client with the current Privacy Policy Notice at least annually.

## **SMS/Text Privacy Policy**

SMS/Text Privacy Policy includes items outlined in our Main Privacy Policy

### **Opting In:**

- You complete “Opt In” consent form on our website or,
- You initiate a text message to us or,
- You provide verbal consent or,
- You reply “YES” to the initial text message sent by your financial professional to authorize text messaging.

### **Opting Out:**

If you wish to stop receiving text messages from us, reply “STOP”, “QUIT”, “CANCEL”, “OPT-OUT”, or “UNSUBSCRIBE” to any text message sent from us.

## **Main Privacy Policy**

By consenting to receive text messages from us, you also agree to our main Privacy Policy.

We encourage you to check our website frequently to see when this Privacy Policy Notice was last revised and to be informed of how we are committed to protecting your information.

## **Any Questions**

If there are any questions, regarding this Privacy Policy Notice, please contact us at [ron@cincinnatiwealth.cc](mailto:ron@cincinnatiwealth.cc)