

PRIVACY NOTICE

SPECTRUM WEALTH MANGEMENT

March 31,2022

Spectrum Management Group, LLC, doing business as Spectrum Wealth Management (“**Spectrum,**” “**we,**” “**our,**” or “**us**”) provides investment advisory and related services (the “Services”) to our clients (“**client,**” “**you,**” or “**your**”) by means of our own internal operation and unaffiliated third-party service and product providers (for example, the account custodian, which processes the investment transactions for your account). Spectrum and the product and service providers we use receive and maintain information about you and your business that is related to the services we provide to you. In this regard, federal law requires us to tell you how we collect, share, and protect your personal information.

The Privacy Policy supplements The Website Terms of Use and is incorporated by reference therein.

The safeguarding of client information is an issue we take seriously, and we want to assure all of our clients that whenever your personal information is collected and used, we do so with discretion. To affirm our continuing commitment to the proper use of our clients’ information, we have set forth the following privacy notices and policies, which are designed to guide us in serving the privacy needs of our clients.

I. RECOGNITION OF CLIENTS’ EXPECTATION OF PRIVACY. At Spectrum, we believe the confidentiality and protection of client information is one of our fundamental responsibilities. Moreover, while information is critical to providing quality services to you, we recognize that one of our most important assets is our clients’ trust. Thus, the safekeeping of client information is a priority for Spectrum.

1. Updates to Spectrum’s Privacy Notice and Practices. Please be aware that Spectrum may deem it necessary to modify this Privacy Notice or its privacy practices from time to time. Spectrum reserves the right to modify or amend its Privacy Notice at any time, in Spectrum’s sole and absolute discretion. Spectrum may or may not provide notice of any modifications directly to you. Modifications to the Privacy Notice are effective upon Spectrum’s posting the amended Privacy Notice to the Site. You may determine the date the Privacy Notice was last amended and the current policies and practices by referring to the “*Effective Date*” above. You should regularly review Spectrum’s Privacy Notice to ensure your continued compliance and agreement.

YOUR USE OF THE SERVICES CONSTITUTES YOUR AGREEMENT TO SPECTRUM’S CURRENT PRIVACY NOTICE AND PRIVACY PRACTICES.

II. CATEGORIES OF INFORMATION SPECTRUM COLLECTS. In order to meet your needs in the course of providing investment advisory services to you, Spectrum may collect the following information about you:

2. Nonpublic Personal Information

- Your name, gender, address, city, state, zip code, email address, telephone number, social security number or taxpayer ID number, and date of birth;
- Your employment status, annual income, total assets, and net worth;
- Information about your accounts at other financial institutions, including lists of investments, account numbers and balances, names of executing and clearing brokers and investment advisers, types of transactions you enter into, parties to the transactions, and investment history;
- Information we obtain about you from consumer reporting agencies, such as credit reports;

- Information we may obtain about you from your use of our services, for example when you interact with our website or third party service and product providers or engage us to perform services; and
- Information you have authorized us to obtain from government agencies, employers, or others.

We may use the Nonpublic Personal Information that we collect about you to provide the Services (such as to operate your account, provide investment advice, or to or administer our website), to analyze and improve the Services, and for our own purposes to market our Services to you. Spectrum may provide access to your Nonpublic Personal Information in the manner described below to assist with the provision and improvement of the Services.

It may be necessary for Spectrum to obtain and share Nonpublic Personal Information with others in order to provide you with certain Services. You are not required to voluntarily provide us with Nonpublic Personal Information, but Spectrum may not be able to provide you with certain Services that may be dependent upon the collection of Nonpublic Personal Information without this information. Please see below for more information about the choices you have regarding our use of your information.

3. *Non-Personal Information.* Spectrum may also collect general, non-personal, technical, statistical, and aggregate information about users of the Services. For example, we may collect information about the devices you use to connect to our Services (such as the IP address of your computer or numeric identifier of your mobile device) and about how you use the Services (such as information about how you use our website). We, and our advertisers and ad servers, may also collect non-personal information outside the Services to measure the success of our advertising campaigns. We may group this information into aggregate data in order to describe the use of the Services to third parties, such as in response to government requests. In some cases, we may collect and aggregate information through the use of collection technologies such as “cookies,” usage analytics and other tracking technologies.

Spectrum may use and disclose Non-Personal Information for any purpose at our discretion. For example, we may use this information to obtain an overview of aggregated demographic, preference, and usage habits, to allow us and our third party partners to modify and improve the Services, and to offer and optimize the provision of targeted information, promotions, offers, or discounts on products and services based on user traffic and behavior.

4. *Cookies, Usage Analytics, and Tracking Technologies.* As is common with websites and other software services, Spectrum may automatically collect non-personally identifiable information and data about you through the use of “cookies,” “web beacons,” usage analytics, and other tracking technologies. We do not use these technologies to collect Nonpublic Personal Information about you.

A “cookie” is a computer file that acts as an identification card for your computer to distinguish your browser from others and enable us to serve you better. Similarly, a “web beacon” is a technology that can recognize specific cookies and convey information about that browser. Most browsers accept cookies automatically. You may be able to set your browser to reject and/or delete cookies. For instructions, check your browser’s technical information. However, please note if you reject or delete cookies this may disable or interfere with the Services or other websites you visit. Spectrum may also use similar tracking technologies which may record information such as Internet domain names and host names, IP addresses, browser software information, operating system information, clickstream patterns, and access information. Our website may also use third-party analytics vendors such as Google Analytics. Please visit Google’s privacy policies (<https://www.google.com/policies/privacy/partners/>) for more information about how data is collected and processed in connection with the Google Analytics service.

Spectrum and our third-party vendors or partners use this information and data for a variety of purposes, such as to improve the design and content of our websites, to help us assess the use of our website and Services, and to analyze our marketing strategies, and to gauge the success of our

advertising campaigns.

Spectrum may link the information it records about you using your IP address, device identifications, and tracking technologies to Non-Personal Information Spectrum may collect about you. Spectrum may use this information for advertising purposes, or to identify a specific user when we feel it is necessary to enforce compliance with Spectrum's Terms of Use, to protect the Services, our clients, or others, or when Spectrum believes in good faith that the law so requires.

III. WHERE DO WE OBTAIN THE INFORMATION. Primarily, the information we obtain about you comes directly from you, which you provide to us on applications, agreements, or other forms. In addition, we maintain records of investments owned by you, account numbers and names of executing and clearing brokers and investment advisers, and information about the transactions and holdings in such accounts. Further, we maintain various correspondence that you provide us, which may include written, telephonic, or electronic communications. We may also receive information from consumer reporting agencies, governmental agencies, employers, publicly available sources, or others whom you have authorized to disclose information to us. Finally, we obtain information about you from the sources and in the ways described in Section II above.

IV. TO WHOM DO WE DISCLOSE THE INFORMATION. We may provide information about you and current or former clients from the sources described above to parties outside of Spectrum only as described below:

1. *To other companies as necessary to provide Services to you and to process your business.* From time to time, we may have relationships with nonaffiliated third parties (such as attorneys, auditors, accountants, brokers, custodians, and other consultants) who, in the ordinary course of providing their services to us, may require access to your information. For example, we process your investment instructions through product and service providers with whom we have business agreements. These service providers are necessary for us to provide our investment advisory Services to you. These parties must agree to limit their use of the information to the purposes for which it was provided. We may also disclose information where the party to whom the disclosure is made controls, is controlled by, or is under common control with Spectrum;

2. *Where required by law or regulation.* Examples include responses to a subpoena, court order, regulatory demand, or where the disclosure is reasonably necessary for the establishment or maintenance of legal claims.

3. *As authorized by you.* You may direct us, for example, to send information about your investment holdings, account, or other financial information to a third party. We may also disclose information where the disclosure is consistent with the purpose for which the Nonpublic Personal Information was obtained.

4. *As otherwise authorized or permitted by law.* For example, the law permits us to respond to a request for information about you from a consumer-reporting agency. We may also disclose information where the disclosure is in our sole discretion about users who we believe are engaged in illegal activities or are otherwise in violation of our policies, even without a subpoena, warrant or court order.

5. *Sale of business or assets.* The disclosure is reasonably related to the sale or other disposition of all or part of our business or assets. Please note Spectrum may purchase other businesses or their assets or sell our business assets. Nonpublic Personal Information is commonly a business asset involved in such transactions. In the event that Spectrum or all or a portion of its assets are acquired, please be aware your Nonpublic Personal Information may be one of the transferred assets.

6. *The information is publicly available.* The Nonpublic Personal Information to be disclosed is publicly available through public forums, databases, or online on publicly available websites, social networks, etc.

Agreements are made between Spectrum and authorized third parties to whom Spectrum is transferring data prior to sharing your Nonpublic Personal Information with such third parties. Spectrum will take reasonable steps to ensure third parties are obligated to reasonably protect your Nonpublic Personal Information and to provide and follow privacy standards that comply with applicable privacy laws. If Spectrum becomes aware that any authorized party is improperly using or disclosing Nonpublic Personal Information, it will notify that party and take commercially reasonable steps to end or correct such use or disclosure.

V. CONFIDENTIALITY AND SECURITY. Spectrum takes reasonable precautions to protect the privacy, security, accuracy, and reliability of any information you provide to us and to protect such information from loss, misuse, unauthorized access, disclosure, alteration and destruction. Spectrum will collect and use Nonpublic Personal Information in ways that are compatible with the purposes for which it was collected or authorized by the individual. We restrict access to information about you to those employees and authorized agents who may reasonably need to know that information in order to provide products or Services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to maintain the confidentiality of your information. Spectrum may store your information indefinitely.

Please be aware that email and other electronic communications are highly susceptible to hacking and other security breaches. When you communicate with Spectrum via email or other electronic means, these communications may not be secure. For that reason, we ask that you do not share sensitive information with us via electronic communication channels without taking precautions to ensure the security of the communication. Spectrum is not responsible for any breaches of data or security resulting from your electronic communications with Spectrum.

The Nonpublic Personal Information you provide and we collect may be stored within databases that are controlled by us or by our Service Providers. Spectrum implements reasonable security measures as we deem appropriate and consistent with industry standards to protect your Nonpublic Personal Information. However, as no data security protocol is impenetrable, Spectrum cannot and does not guarantee the security of our systems or databases, nor can we guarantee that Nonpublic Personal Information you supply to us will not be breached, intercepted, or otherwise disclosed without authorization. As a result, any information you transfer to or from the Services is provided at your own risk.

You may be required to register for an account and create a password in connection with the Site and Services, in which case your online account information will be protected by your password. Spectrum strongly recommends you choose a strong password and take appropriate steps to ensure your password is not disclosed to any other person. You are solely responsible for maintaining the confidentiality of your account and your passwords and you are responsible for all activities that occur under your account, regardless of whether you perform the activities. If you have reason to believe that your account is no longer secure, you must immediately notify Spectrum using the contact information provided below.

VI. YOUR CHOICES REGARDING YOUR INFORMATION. Spectrum welcomes you to contact us regarding the information Spectrum may have collected about you, how Spectrum is using or sharing your information, to update or delete your information, or to opt-out of the collection and use of your information. Spectrum may require proof of your identity before it provides you with any requested information.

You may delete or request that we delete any information that you provide to Spectrum, however we will not delete any data obtained from other sources, such as data collected via analytics or aggregation, except as required by applicable law. If you wish to obtain, correct, or amend information we hold about you, you may contact us using the contact information provided below.

VII. ADDITIONAL POLICIES REGARDING YOUR INFORMATION.

1. Third Party Websites and Links. Please be aware that you may have cookies placed on your computer by third party websites that refer you to the Services. Although Spectrum does not share your

Nonpublic Personal Information with these third party websites unless authorized to do so, they may be able to link certain non-personally identifiable information Spectrum transfers with Nonpublic Personal Information previously collected from you. You should review the privacy policies of each website you visit to better understand their privacy practices and these risks.

When you click on links which take you to third party services or websites, you become subject to the third parties' own privacy policies. While Spectrum supports the protection of your privacy, Spectrum expressly disclaims any and all liability for the actions of third parties including, without limitation, to actions relating to the use and/or disclosure of Nonpublic Personal Information by third parties.

The Services may contain links to other services or websites operated by third parties. Spectrum does not control such other services or websites and is not responsible for their content or their privacy policies. Spectrum's inclusion of such links does not imply any endorsement of the material on such sites or of their owners or operators, except as may be disclosed within the Services. Any information submitted by you directly to these third parties is subject to that third party's privacy policy.

2. Do Not Track. Spectrum does not currently employ a process for automatically responding to "Do Not Track" (DNT) signals sent by web browsers or other mechanisms that may provide consumers a choice regarding the collection of personally identifiable information about an individual consumer's online activities. As is commonly the case with many other mobile applications and websites, third parties (e.g., advertisers) may be able to collect personally identifiable information about your online activities over time and across different websites or online services when you use the Services.

3. International Visitors. The information Spectrum collects about you may be transferred, processed and/or accessed by us in the United States or another country where we (or our service providers) operate. Please be aware Nonpublic Personal Information may be transferred to, and maintained on, computers located outside of your state or country where the privacy laws may differ from and may not be as protective as those where you live. If you are located outside the United States and choose to provide information to us, please be aware that Spectrum may transfer Nonpublic Personal Information to the United States and process and store it there. By submitting your Nonpublic Personal Information, you consent to having your personal data transferred to, processed, and stored in the United States.

4. Governing Law. This Privacy Notice and the privacy practices of Spectrum are made under, and shall be construed according to, the laws of the State of Indiana without regard to conflict of law principles. Spectrum makes no representation that this Privacy Notice and such practices comply with the laws of any other state or country. You and Spectrum agree to submit to the personal and exclusive jurisdiction of the state and federal courts located within Marion or Hamilton Counties of Indiana for the purpose of litigating all such disputes, and waive objection to venue laid therein. Spectrum operates the Services from our offices in Indiana, and we make no representation that the Services or Property included in the Services are appropriate or available for use in other locations.

VIII. CONTACTING SPECTRUM. All questions or concerns about this Privacy Notice or Spectrum's privacy practices, should be directed to Spectrum's Chief Compliance Officer via the following contact information:

Attn: Chief Compliance Officer
Spectrum Wealth Management
600 East 96th Street, Suite 130
Indianapolis, IN 46240
Email: lthompson@spectrum-mgmt.com

STATE SPECIFIC DISCLOSURES

California, North Dakota, and Vermont Clients have other protections under state law. If your primary mailing address is in California or Vermont, we will not share your credit or financial information that we collect except as permitted by law, including, for example, with your consent or to service your account. We will also not use your information for joint marketing purposes. We do not share client information with third parties except as permitted by law.

California residents may be eligible to exercise consumer privacy rights under the California Consumer Privacy Act or “CCPA” (Cal Civ. Code §1798.100 et seq.). This notice is provided according to the CCPA, and, if eligible, you may exercise the following rights.

See our main notice, above which describes your rights and the ways in which we collect and maintain your information.

Important information for Nevada residents – At any time, you may request to be placed on SWM’s internal do-not-call list by calling us toll-free at 1-317-663-5600. Nevada law requires that we provide you with the following contact information to enable you to obtain further information: (i) Spectrum Management Group, LLC, 600 East 96th Street, Suite 130, Indianapolis, Indiana 46240, Phone: 1-317-663-5600, email: lthompson@spectrum-mgmt.com; and (ii) Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Street, Suite 3900, Las Vegas, Nevada 89101, Phone: 1-702-486-3132, Email: BCPINFO@ag.state.nv.us