

FACTS	WHAT DOES SPECTRUM WEALTH MANAGEMENT DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share will depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>- Your Name, Social Security number, and date of birth</li> <li>- Income and net worth and investment information</li> <li>- Brokerage and banking statements and information about your other personal and retirement accounts held away from our firm.</li> <li>- Tax information</li> <li>- Employment status and residential information, and personal contact information (i.e., phone numbers and email addresses)</li> <li>- Information you have authorized us to receive from government agencies</li> </ul>
How?	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Spectrum Wealth Counsel, LLC, doing business as Spectrum Wealth Management ("SWM"), chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does SWM share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), internal reviews and audits, respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We do not share
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We do not share
<b>For nonaffiliates to market to you</b>	No	We do not share

To limit our sharing	<ul style="list-style-type: none"> <li>- Call 317.663.5600</li> <li>- Visit us online: <a href="http://www.spectrum-mgmt.com">www.spectrum-mgmt.com</a> <b>or</b></li> <li>- Mail the <b>form</b> below</li> </ul> <p><b>Please note:</b></p> <p>If you are a <i>new</i> client, we can begin sharing your information one (1) day from the date we sent this notice. When you are <i>no longer</i> our client, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
Questions?	<ul style="list-style-type: none"> <li>- Call 317.663.5600 or go to <a href="http://www.spectrum-mgmt.com">www.spectrum-mgmt.com</a></li> </ul>

What we do	
How does SWM protect my personal information?	<p>Primarily, the information we have comes directly from you, which you provide 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.</p> <p>Further, we maintain various correspondence you provide us, including written, telephonic, or electronic communications.</p> <p>Finally, we may receive information from consumer reporting agencies,</p>

	<p>governmental agencies, employers, or others whom you have authorized to disclose information to us.</p> <p>We use security measures that comply with federal law to protect your personal information from unauthorized access and use. These measures include computer safeguards and secured files and storage space.</p>
<b>How does SWM collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>• open an account or engage our firm for financial planning or consulting services.</li> <li>• tell us about your portfolio or deposit money</li> <li>• enter into an investment advisory contract with us</li> </ul>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. [See below for more on your rights under state law.]</p>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	<p>Your choices will apply to everyone on your account—unless you tell us otherwise.</p>
<b>Definitions</b>	
<b>Affiliates</b>	<p>Companies are related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• <i>Spectrum Private Trust (SPT) Focus Operating, LLC, Focus Operating, LLC and Focus Risk Solutions, LLC are our affiliated entities.</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• <i>Your qualified custodian or broker/dealer, accountants, attorneys, consultants, auditors, insurance agencies, data processors, software companies, marketing service providers, and state and federal government agencies.</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>• <i>SWM does not jointly market</i></li> </ul>
<b>Other important information</b>	
<p><b>State Disclosures</b></p> <p>In addition to your rights described below and in this notice, you may have other rights under state laws. We will comply with applicable state laws concerning our information practices.</p> <p><b>California, North Dakota, and Vermont Clients have other protections under state law.</b> 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.</p> <p>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.</p> <ol style="list-style-type: none"> <li>1. You have the right to know about the personal information collected, disclosed, or sold. Please contact as directed above or use the mail-in form below.</li> <li>2. We may collect information about your employment, financial, location, and government-issued information.</li> <li>3. We may obtain personal information directly from the individual or government entities to provide, maintain and service your account(s). We may also utilize this information for: <ul style="list-style-type: none"> <li>• compliance/legal and regulatory purposes</li> <li>• identity protection/fraud prevention/safety and security</li> <li>• client concerns/complaints</li> </ul> </li> <li>4. We may provide information to the following third (3<sup>rd</sup>) parties to process transactions and maintenance of accounts:</li> </ol>	



- Service providers
- Operating systems and platforms
- Government entities
- Data analytics
- Affiliates

**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 Wealth Management, LLC, 600 East 96<sup>th</sup> Street, Suite 130, Indianapolis, Indiana 46240, Phone: 1.317.663.5600, email: [ltompson@spectrum-mgmt.com](mailto:ltompson@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](mailto:BCPINFO@ag.state.nv.us).

Mail-in Form		
If you have a joint account, your choice(s) will apply to everyone on your account.	Mark any/all you want to limit:	
	<input type="checkbox"/> Please delete my personal information after your firm’s regulatory required maintenance has been met.	
	<input type="checkbox"/> Please provide the personal information SWM has collected, disclosed, or sold.	
	<input type="checkbox"/> Please do not share my information with affiliates for marketing purposes.	
	<b>Name</b>	
<b>Address</b>		<b>Mail to:</b> Spectrum Wealth Management. 600 E. 96 <sup>th</sup> St., Ste 130 Indianapolis, IN 46240
<b>City, State, Zip</b>		
<b>[Account #]</b>		

**What to Expect When Exercising Rights**

In the event you submit either (a) a request to Know About Personal Information Collected, Disclosed, or Sold or (b) a request for Deletion of Personal Information, you can expect the following:

- We will determine whether your request can be fulfilled, which may include verifying your identity, determining whether you have reached your request limit (no more than two for the preceding 12 months), determining whether you reside in a state that provides these rights, and determining whether you are ineligible under any other exception.
- We may take up to 45 days to fulfill your request.
- We may also extend the time to fulfill your request by another 45 days (for a total of 90 days); however, we will notify you when we make this extension.
- We will provide you with your response via your chosen communication method (mail or email). We may take up to 45 days to fulfill your request.

Please note, as discussed above, your submission does not guarantee that we will fulfill your request.