

Quiet Wealth LLC

Privacy Policy

Revised as of October 13, 2021

Version 002-1

1. Introduction

This Privacy Policy (the “**Policy**”) for Quiet Wealth LLC (“**QW**”, “**we**”, “**us**”, or “**our**”) describes the policies and procedures that we use to collect, use, disclose, share, and protect your Personal Information.

“**Personal Information**” is your personally identifiable information, such as your name, address, email address, social security number, date of birth, and any other information that can be used to identify you personally, as well as financial information you provide us if you opt to become a prospective client or client of QW. Personal Information includes both “**Basic Personal Information**” (as defined below) and “**Sensitive Personal Information**” (as defined below).

We may collect, use and share your Personal Information if you engage in any one of the following activities:

- Use our Site, <https://www.quietwealth.com>, or certain applications used in conjunction with or in support of the Site
- Become a client or prospective client of QW, during which you share Personal Information with us
- Participate in events, seminars or other activities where this Policy is posted
- Receive our marketing communications or engage with us on our social media channels.

QW recognizes that our relationships with current clients and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us.

QW will provide this Policy to all clients prior to engagement and at least annually thereafter.

We want our clients, prospective clients and users of our web-based resources to understand what information we collect, how we use it, and how we protect your personal information.

2. Information We Collect

Below is a list of information we may collect and share about you. In addition, we may rely on “**Service Partner Vendors**” (as defined below) to collect information on our behalf. If you engage on our website, participate in seminars or other events, receive marketing communications from us or engage in our social media channels, we may collect and share the following **Basic Personal Information**:

- Name
- Address
- Phone Number
- Email Address
- Your marketing communications preferences
- Your browsing history on our website through cookies

If you become a client or prospective client, we may collect and share the following **Sensitive Personal Information** with our “**Critical Service Partner Vendors**” (as defined below); however, we will not

share any of the following information with other parties without either your consent or a government or judicial mandate:

- Social Security Number
- Income
- Assets and account balances
- Investment experience and risk tolerance
- Tax-related information, including returns
- Information about your beneficiaries and minor dependents
- Communications between you and us
- Payment information
- Estate planning documents
- Sensitive information related to a business that you personally own

We may combine Personal Information that we receive from you with Personal Information that we receive from other sources, such as:

- Data providers
- Public sources, such as social media websites
- Our Service Partner Vendors

We and our Service Partner Vendors may collect information about you, your computer, your mobile device and activity over time on the Site and other online services, such as:

- Device data, such as your IP address, other websites you previously visited, and location information
- Online activity data, such as pages you viewed, navigation between pages and other usage metrics

We also use the following technologies for a variety of business and marketing functions:

- **Cookies** are text files that allow us and our Service Partners to identify your device in order to remember your preferences, improve functionality, help us understand usability of our website and facilitate online advertising.
- **Web beacons**, also known as pixel tags, tell us and our Service Partners that a website or email was opened and that certain content was accessed or clicked on.
- **Software Development Kits and Application Programming Interfaces** enable us to share information between and among us and our Service Partner Vendors

3. How We Use Your Information

Below we list the reasons why Quiet Wealth LLC collects and shares customers' personal information:

Service Delivery. We collect Personal Information and share selected information with our Service Partner Vendors to:

- Operate our website;

- Support our financial planning analysis;
- Support our investment operations;
- Support our client management operations;
- Communicate with you;
- Personalize your experience in conjunction with the website and other services that we offer; and
- Respond to your requests and questions.

Marketing and Advertising. We collect Personal Information and share selected information with our Service Partner Vendors to:

- Send marketing e-mails and other communications; and
- Deliver Internet-based advertising to prospective customers and the public.

Compliance and Operations. We collect Personal Information and share selected information with our Service Partner Vendors and legal and regulatory authorities to:

- Comply with applicable laws, lawful requests, and to respond to subpoenas or requests from government or regulatory authorities;
- Protect our and your rights as part of litigation;
- Audit our internal processes; and
- Prevent, identify, investigate, and deter fraudulent, illegal and unethical activity, including cyberattacks and identity theft.

4. With Whom We Share Information

We may share your personal information with the following parties:

Service Provider Vendors, which includes:

- **Critical Service Provider Vendors** provide us key technologies and services that enable us to run our business and to serve our clients. This includes financial services companies (including our custodians) and companies that operate our financial planning, customer relationship management, accounting, portfolio management, performance reporting, payment systems, data archiving and other critical systems. We share both Basic Personal Information and Sensitive Personal Information with these parties.
- **Non-Critical Service Provider Vendors** provide a variety of services such as marketing technology, technology companies that perform and display digital advertising on our behalf, event management companies, and printing and mail fulfillment companies. This also includes **Advertising Companies**, which are third parties that collect information about your web browsing activity on our site and help us advertise our services. We only share Basic Personal Information with these parties.

Client Professional Advisors are other advisors that our clients have engaged, including attorneys, insurance agents, and tax advisors. We only share such Personal Information with Professional Advisors upon receiving consent of the client or prospective client.

Legal and regulatory authorities and Quiet Wealth’s professional advisors. We may be required to disclose your information to certain governmental authorities for the reasons listed in the “Compliance and Operations” subsection of the section entitled “3. How We Use Your Information.” In addition, we will disclose Personal Information to our accounting, legal and other advisors to ensure that we remain compliant with all laws and regulations. We are not required to receive your consent for sharing your Personal Information with these parties.

5. How We Do NOT Use Your Information

QW’s policy is that it neither shares nor sells any of your Personal Information:

- For joint marketing with other companies;
- For use by our affiliates (as QW has no affiliated companies); or
- For nonaffiliated companies to market to you.

6. How We Protect Your Information

Privacy has always been important to QW. We restrict and limit access to client information only to those who need to carry out their business functions. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information. However, security risk is inherent in all information technology, and we cannot guarantee the security of your Personal Information.

7. Your Choices

Federal law gives consumers the right to limit some but not all sharing. Federal law gives you the right to limit only:

- Sharing for affiliates’ everyday business purposes
- Affiliates from using your information to market to you
- Sharing for non-affiliates’ business purposes

Because QW does none of the above activities and only collects and shares information to support QW’s operations, consumers of QW are generally limited in their ability to limit our sharing of Personal Information.

State laws and individual companies may give you additional rights to limit sharing. See Section 8 of this policy regarding the opt-in policy for clients of QW.

At this time, we do not enable web browser Do Not Track signals on our website.

Opt-out of email newsletter. If you are currently a recipient of our email newsletter, you may opt-out of the newsletter subscription by clicking on the “Unsubscribe” link at the bottom of a newsletter email.

Cookies. Most web browsers enable you to control to what extent cookies are stored on your computer or mobile device. To learn more, please consult the Help section for the web browser that you use.

Declining to provide information. Should you elect to engage our services as a client, we require that you provide Personal Information, including Sensitive Personal Information. If you decline to provide such information, we will not be able to offer our services to you.

8. Required Opt-In of Consent to Share Non-Public Information for QW’s Clients

Under Massachusetts law, it is deemed a dishonest and unethical business practice for an investment adviser to:

“[disclose] the identity, affairs or investments of any client to any third party unless required by law to do so, or unless consented to by the client.”

The current regulation prohibits QW from sharing non-public personal information with non-affiliated third parties unless the client specifically consents to the disclosure.

QW requires clients to opt-in to sharing their nonpublic information with non-affiliated third parties & service providers, as deemed appropriate, by signing an opt-in form. QW will not enter into an advisory agreement unless the client provides such written consent.

In addition, if QW amends its privacy policy, it will require all existing clients to again provide consent to sharing as described under the amended policy by signing an opt-in form. If an existing client does not provide such consent in a timely manner, we will be forced to terminate our advisory relationship with them.

Even if we cease to provide you with financial services, our Privacy Policy will continue to apply to you. We maintain all records regarding all former clients for the retention period required by law.

An opt-in form is provided in Appendix A of this policy.

9. Notice Regarding Account Aggregation Feature through eMoney

In working with most clients, we generally use software provided by eMoney Advisor, LLC (“eMoney”) to assist us in gathering your financial data from other institutions, which enables you and us to better understand the household financial profile. In most but not all cases, we will request that you enable us to use the account aggregation feature of eMoney in order to become a client of ours.

Clients are encouraged to review the eMoney’s privacy policy, a link to which may be found in the footer of eMoney’s website at <https://www.emoneyadvisor.com>

10. Children

QW’s website and other services are not intended to be used by children under 18 years of age. If we learn that we have collected Personal Information from a child under 18 years of age without the consent of the child’s parent or guardian, the Personal Information associated with the child will be deleted.

11. Changes to this Privacy Policy

We reserve the right to change the Policy at any time. If we make material changes to this Policy, we will notify you both through the website and, if you are a subscriber to Quiet Wealth's newsletter, through email. Your continued use of the Site after the posting of any modified Policy indicates your acceptance of the policy.

As discussed in Section 8, existing clients will be required to provide opt-in to share non-public information following any changes to the Policy.

12. Contacting Quiet Wealth

You may contact QW:

- By mail: Quiet Wealth LLC, 3 Clear Skys Ct. Apt. 202, Baltimore, MD 21209
- By telephone: 443-687-7870

APPENDIX A
OPT-IN FORM TO QUIET WEALTH'S PRIVACY POLICY

By signing below, I/we consent to the disclosure of my non-public information as described in Quiet Wealth LLC's privacy policy dated October 13, 2021 (version 002-1).

Person 1:

Person 2 (if applicable):

Printed Name

Printed Name

Signature

Signature

Date

Date