Updated Privacy Policy for Proxy Wealth Advisors LLC

Effective: June 25, 2024

Our Commitment to You

Proxy Wealth Advisors LLC ("PWA") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. PWA (referred to as "we", "our," and "us" throughout this notice) protects the security and confidentiality of the personal information we have and makes efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does PWA provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

- Name and address
- Email address
- Phone number
- Social security or taxpayer identification number
- Accounts at other institutions
- Assets
- Income
- Account balance
- Investment activity

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements, and other Subscription and Account Opening Documents
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires
- Information about your transactions with us or others

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Information about You That PWA Shares

PWA works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.

In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators to satisfy PWA's regulatory obligations, and as otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administer our business, for example, but not limited to, financial planning software providers and accountants. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

We do not sell your non-public personal information to anyone.

Information about Former Clients

PWA does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

Confidentiality and Security

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural, and electronic safeguards in an effort to protect the information from access by unauthorized parties.

Your Rights and Choices

You have the right to access and correct your personal information. You may also request that we delete your personal information, subject to certain exceptions provided by law. To exercise these rights, please contact us at the provided contact details.

Regulatory Compliance

We comply with the General Data Protection Regulation (GDPR) for our clients within the European Union (EU) and the California Consumer Privacy Act (CCPA) for our clients in California. This means we provide additional rights and information as required by these regulations, including the right to access your data, the right to delete your data, and the right to opt-out of data sales, even though we do not sell personal data.

Reasons We Can Share Your Personal Information

Financial companies need to share customers' personal information to run their everyday business. We list the reasons financial companies can share their customers' personal information; the reasons PWA chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does PWA share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don't share
For non-affiliates to market to you	No	We don't share

Definitions

- **Affiliates**: Companies related by common ownership or control. They can be financial and nonfinancial companies.
  - Our affiliates include Proxy Wealth Partners, LLC.
- **Non-affiliates**: Companies not related by common ownership or control. They can be financial and nonfinancial companies.
  - Proxy Wealth Advisors does not share with non-affiliates so they can market to you.
- **Joint Marketing**: A formal agreement between nonaffiliated financial companies that together market financial products or services to you.
  - Proxy Wealth Advisors does not jointly market.

Other Important Information

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights under the California Consumer Privacy Act (CCPA), visit our CCPA Privacy Notice.

Please note if you provide us with a phone number it will not be utilized for any type of marketing outreach via SMS communications. Prior verbal consent is required to receive SMS communications. Message and Data rates may apply. Messaging frequency may vary. You can text STOP to opt out of SMS communications at any time.

We'll Keep You Informed

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically, we may revise our privacy policy and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

CCPA Privacy Notice

Effective: June 25, 2024

Your Rights under the CCPA

If you are a California resident, you have specific rights regarding your personal information under the California Consumer Privacy Act (CCPA). These rights include:

1. **Right to Know**: You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months.
2. **Right to Delete**: You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions.
3. **Right to Opt-Out**: You have the right to opt-out of the sale of your personal information. However, Proxy Wealth Advisors does not sell personal information.
4. **Right to Non-Discrimination**: You have the right not to receive discriminatory treatment by us for exercising any of your CCPA rights.

Categories of Personal Information We Collect

We collect information that identifies, relates to, describes, references, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

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- Identifiers (e.g., real name, postal address, email address, social security number)
- Personal information categories listed in the California Customer Records statute (e.g., name, contact information, financial information)
- Protected classification characteristics under California or federal law (e.g., age, gender)
- Commercial information (e.g., transaction information, purchase history)
- Internet or other similar network activity (e.g., browsing history, search history)
- Geolocation data
- Professional or employment-related information
- Inferences drawn from other personal information

How We Use Your Personal Information

We use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information
- To provide, support, personalize, and develop our services
- To create, maintain, customize, and secure your account with us
- To process your requests, transactions, and payments
- To provide you with support and respond to your inquiries
- To improve our website and services
- For testing, research, analysis, and product development

How to Exercise Your CCPA Rights

To exercise the rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 646-289-5075
- Emailing us at privacy@proxyfinancial.com
- Visiting our website at https://www.proxyfinancial.com
- Our office address 19505 Biscayne Blvd, Ste 2350, Aventura FL 33180

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.