

## Privacy Policy

Investment advisers are required by law to inform their clients of their policies regarding the privacy of client information. Federal law gives the customer the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand **Strategic Wealth Capital's** Privacy Policy.

### **TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT**

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security/Tax ID Number, Dates of Birth, Banking Information, Financial Account Numbers and/or Balances, Sources of Income, and Credit Card Numbers or Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

### **PARTIES TO WHOM WE DISCLOSE INFORMATION**

All Investment Advisers may need to share personal information to run their everyday business. In the section below, we list the reasons that we may share your personal information:

**For everyday business purposes** – In order to provide our services, maintain business operations, and as required/permitted by law our firm and/or affiliates may share NPI with non-affiliated third parties. The purpose for such disclosures may include but are not limited to:

- Processing your transactions
- Maintaining your account(s)
- Responding to court orders and legal investigations
- Maintaining accurate books and records
- Servicing your account(s)
- Auditing of account information
- Fulfilling requests from you or your authorized representatives

**For marketing purposes** – In order for our firm, our affiliated firms, and non-affiliated firms to offer additional products and services to you we may share NPI with non-affiliated third parties.

Clients may opt out of sharing information for joint marketing to other financial companies, to our affiliates and to nonaffiliates. If you are a new customer, we may begin sharing your information on the day you sign our agreement. When you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

### **PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building. Our physical, electronic, and procedural safeguards have been reasonably designed to protect your information.

### **FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING – OPTING OUT**

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: sharing for non-affiliates’ everyday business purposes – information about your creditworthiness; sharing with affiliates who use your information to market to you; or sharing with non-affiliates to market to you.

State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.

California Residents: The California Consumer Privacy Act (“CCPA”) applies to those clients who **reside\*** in California.

**\*For purposes of the CCPA, a California resident is someone who is domiciled in California. This can include either (i) someone who typically resides in California but is on vacation elsewhere or (ii) someone temporarily domiciled in California for work.**

As aforementioned, within the course of business, we collect Client Information regarding information from applications or other forms, identifying information, information from your transactions with us, and information from consumer reporting agencies, as outlined above. Upon request, we shall provide: (i) the categories of personal information that have been collected; (ii) the categories of sources from which the personal information is collected; (iii) what the business or commercial purpose is for the collecting or selling of personal information; (iv) the categories of third parties that the business shares personal information with; and (v) the specific pieces of personal information that have been collected about that consumer.

Your Client Information will only be disclosed to outside entities under the delineated exceptions outlined in the “Information We Disclose” section above or under any of the exceptions listed in the CCPA. None of your Client Information is sold to anyone or accessible by anyone other than the necessary Supervised Persons Strategic Wealth Capital LLC and or the custodian of your assets.

Under the CCPA, California residents have a right to request the deletion of their personal information, unless that information is necessary for the business to: (i) complete the transaction requested by the California resident for which the personal information was collected; (ii) engage in internal uses reasonably aligned with the expectations of the California resident based on their relationship with the business; or (iii) otherwise use the personal information in a manner consistent with the context that the information was provided. As the use of your Client Information meets all of these exceptions, Strategic Wealth Capital, LLC cannot guarantee that all Client Information collected in the course of business can be deleted upon request.

Clients who invoke their rights under the CCPA will not be discriminated against.

Strategic Wealth Capital, LLC will comply with all other provisions of the CCPA.

#### DEFINITIONS

- Nonaffiliates: Companies not related by common ownership or control. They can be financial and non-financial companies.
- Joint marketing: A formal agreement between non-affiliated financial companies that together market financial products or services to you.

#### Questions

If you have any questions about our Privacy Policy, you may contact your Financial Advisor or Justine Kidwell, Chief Compliance Officer of Strategic Wealth Capital, LLC.

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