

## PWF Privacy Policy Notice

**Commitment to Your Private Information:** Pathworks Financial, Inc. (**PWF**) has a policy of protecting the confidentiality and security of the information we collect about our clients and prospects. We do not, and will not, share non-public personal Information (“Information”) about you with outside third parties without your consent, except for the specific purposes described below. This notice has been provided to you to describe the Information we may gather and the situations under which we may need to share it. This privacy policy notice is given to all current and prospective clients of **PWF** and is also provided annually thereafter.

**Why We Collect and How We Use Information.** If you are an advisory client, we limit the collection and use of Information within our firm to only those individuals associated with or employed by us that must have Information to provide financial services to you. Such services include maintaining your accounts, processing transaction requests, and providing the advisory services described in our Form ADV.

Personal Information we collect on our Website is used for the following purposes:

- **SMS Program:** If you opt into our SMS program, we will send you messages regarding our services, updates, policies, and promotional offers. You will receive messages about product updates, service notifications, and special offers. You can opt-out at any time.
- **Marketing and Communications:** To send you marketing materials and communicate with you about our services.
- **Prospecting:** To analyze your data to understand your preferences and prospect for new clients.
- **Customer Support:** To respond to your inquiries and provide support.

**Data we collect on our Website:** We collect various types of personal data, including:

- **Identity Data:** First and last name.
- **Contact Data:** Email address, phone number, residence address
- **Technical Data:** IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- **Usage Data:** Information about how you use our website, products, and services.
- **Marketing and Communications Data:** Your preferences in receiving marketing from us and your communication preferences.

**How We Gather Information.** We get most Information directly from you when you provide us with Information from any of the following sources:

- Applications or forms (for example: name, address, social security number, birth date, assets, income, financial history)
- Information developed as part of financial plans, analyses or investment advisory services
- Transactional activity in your account (for example: trading history and account balances)

- Other sources with your consent (for example: your insurance professional, attorney or accountant)
- Direct Interactions: You provide your personal data when you fill out forms, create an account, subscribe to our services, request marketing materials, or give us feedback.
- Automated Technologies: As you interact with our website, we may automatically collect technical data about your equipment, browsing actions, and patterns. We collect this data using cookies, server logs, and other similar technologies.

**How We Protect Your Information.** Our employees and affiliated persons are required to protect the confidentiality of Information and to comply with our stated policies. They may access Information only when there is an acceptable reason to do so, such as to service your account or provide you with financial services. Employees who violate our Privacy Policy are subject to disciplinary action, up to and including termination from employment with us. We also maintain physical, electronic and procedural safeguards to protect Information, which comply with applicable SEC, state, and federal laws.

**Former Customers.** Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you, and we will continue to treat your non-public Information with strict confidentiality.

**Sharing Information with Other Companies Permitted Under Law.** We do not disclose Information obtained during our practice except as required or permitted under law. Permitted disclosures include, for instance, providing Information to unrelated third parties who need to know such Information to assist us in providing services to you. Unrelated third parties may include broker/dealers, mutual fund companies, insurance companies, and the custodian with which your assets are held. In such situations, we stress the confidential nature of Information being shared.

**Data Storage, Maintenance, and Protection.** We implement appropriate security measures to protect your personal data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. These measures include:

- Data Encryption: Encrypting personal data to protect it from unauthorized access.
- Access Controls: Limiting access to personal data to authorized personnel only.
- Regular Security Assessments: Conducting regular security assessments to identify and mitigate potential vulnerabilities.

**You have the following rights regarding your personal data:**

- Access: You can request access to the personal data we hold about you.
- Correction: You can request correction of any incomplete or inaccurate data we hold about you.
- Erasure: You can request deletion of your personal data where there is no good reason for us to continue processing it.
- Objection: You can object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation that makes you want to object to processing on this ground.

- Restriction: You can request restrictions on the processing of your personal data.

**Opt-Out Options and Mobile Information.** You have the right to opt out of receiving marketing communications from us at any time by:

- SMS: Replying "STOP" to any SMS message you receive from us. Email: Clicking the "unsubscribe" link in any email you receive from us.
- Account Settings: Updating your preferences in your account settings on our website.

**More on mobile Information usage, collection, and privacy.**

Our SMS program provides updates, notifications, and promotional messages related to our services. By subscribing to our SMS program, you consent to receive SMS messages at the phone number provided. Message frequency may vary based on your interaction with our service.

We do not share your mobile Information with third parties or affiliates for marketing or promotional purposes. Additionally, all the categories of personal data mentioned above exclude text messaging originator opt-in data and consent. This Information will not be shared with any third parties under any circumstances. However, we may share your data with trusted service providers who assist us in operating our SMS program, provided they agree to keep your data confidential and use it solely for the purpose of providing services on our behalf.

You have the right to access, correct, verify, or remove your personal Information at any time. To manage your Information, please contact us at [info@pwfin.com](mailto:info@pwfin.com) or call us at (248) 946-4515.

**Opt-Out Option:** If you wish to opt-out of receiving SMS messages, you may do so at any time by replying "STOP" to any of our messages or by contacting us at (248) 946-4515. Opting out will not affect your other interactions with our services.

**Changes to this Privacy Policy.** We may change our Privacy Policy from time to time when necessary to reflect changes in our Services, how we use personal Information, or the applicable law. If we make changes, we will revise the "Updated" date at the bottom of this Notice. If we make material changes, we will provide you with notice or obtain consent regarding such changes as may be required by law. We encourage you to review this Privacy Policy Notice whenever you access our Services or otherwise interact with us to stay informed about our privacy practices and the ways in which you can manage your Information.

The practices described in this Privacy Policy Notice are subject to the applicable laws in the locations in which we operate.