



PRIVACY POLICY NOTICE

Last Updated: January 1, 2026

Pathworks Financial, Inc. ("PWF") is committed to maintaining the confidentiality, integrity, and security of the personal information we collect about our current, former, and prospective clients. We do not, and will not, share non-public personal information ("Information") about you with outside third parties without your consent, except as permitted or required by law and as described in this Notice.

This Privacy Policy explains (1) what Information we collect, (2) how we collect it, (3) how we use it, (4) with whom we may share it, (5) how we protect it, and (6) your rights regarding your Information. This Privacy Policy is provided to all clients and prospects initially and annually thereafter.

1. Information We Collect and Why

If you are an advisory client, we limit the collection and use of Information within our firm to only those individuals who require such Information to provide advisory and financial services. These services include maintaining your accounts, processing transactions, providing financial planning, and communicating with you.

We also collect personal information from website visitors and individuals who opt into our SMS or marketing programs.

2. Categories of Information We Collect

- Identity Information – Name, date of birth, SSN or TIN.
- Contact Information – Email, phone numbers, physical/residence address.
- Financial Information – Assets, income, account balances, transaction history, investment objectives.
- Website & Technical Information – IP address, browser type, device identifiers, usage data, cookies.
- Marketing & Communications Data – Opt-in status and preferences.
- SMS Program Data – Mobile number and interaction history.

3. How We Collect Information

- Information you provide directly – applications, documents, communications, forms.



- Information developed during advisory services – financial plans, analysis, account data.
- Information from authorized third parties – attorneys, accountants, insurance professionals.
- Automated website collection – cookies, log files, and similar technologies.

4. How We Use Your Information

We use Information for advisory services, account maintenance, compliance with laws, customer support, internal analytics, and providing updates or marketing communications (with opt-out options available). We do NOT sell your Information.

5. Sharing Information With Third Parties

We do not disclose Information except as required or permitted by law. Permitted disclosures include sharing with custodians, broker-dealers, insurance companies, and technology vendors who assist us in providing services. All service providers must safeguard Information and use it only for intended purposes.

We do NOT share or sell SMS opt-in data.

6. How We Protect Your Information

We maintain physical, electronic, and procedural safeguards in compliance with SEC Regulation S-P and applicable regulations.

Security measures include:

- Encryption of data.
- Access controls and authentication protocols.
- Regular security assessments.
- Procedures for secure storage, retention, and destruction of data.
- Mandatory employee confidentiality and annual compliance training.

All supervised persons must protect client confidentiality and may only access Information when required for their duties. Employees are prohibited from sharing client information with unauthorized individuals, including spouses, friends, or anyone outside PWF.



7. Information About Former Clients

If you cease to be a client of PWF, our Privacy Policy continues to apply, and we will maintain your Information as described in this Notice.

8. Your Privacy Rights

You may request access, correction, deletion, or restriction of your Information, or object to certain processing. To exercise these rights, contact info@pwfin.com or (248) 946-4515.

You may opt out of marketing communications by replying STOP to SMS messages, clicking unsubscribe in emails, or updating your online preferences.

9. SMS Program Privacy

Our SMS program sends updates, notifications, and promotional messages. Message frequency varies. SMS data is not shared with third parties for marketing.

10. Website Data Practices & Terms of Use

PWF's website may collect data through cookies and similar technology. Use of our digital platforms is also subject to our Terms of Use (2026).

11. Changes to This Privacy Policy

We may revise this Notice periodically and will update the "Last Updated" date accordingly.

12. Contact Us

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