



SANCTUARY
WEALTH

Privacy Policy: Protection of Your Personal Financial Information Sanctuary Wealth

Who We Are

Sanctuary Securities, Inc. is a broker-dealer and a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). Sanctuary Advisors, LLC is an SEC Registered Investment Adviser. Our registered representatives and financial professionals provide financial products and services to the general public.

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some, but not all, information sharing. Federal law also requires us to describe how we collect information about you, under what circumstances we may disclose the information to others, and how we safeguard your information in our possession.

Please read this notice carefully to understand our privacy policies.

Why We Collect Information

We collect and use information about you in order to provide you with our financial products and services. For example, we use your information to determine the appropriateness of our investment recommendations and to process transactions for your account.

What Information We Collect

The information we collect may include personal financial information such as your name, address, social security number, assets, income, net worth, investment experience, risk tolerance, investment objective, beneficiary designations, and other information derived from your account application.

How We Collect Information

We obtain most information directly from you when you establish an account or purchase financial products or services from us. For example, we may collect your personal information directly from you when you seek financial advice about your investments, direct us to buy or sell securities, provide employment information, or provide us with your government-issued ID. We may also obtain information about you from our financial professionals, and from third parties such as retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies, your former broker-dealer, or adviser, as well as their registered representatives or advisors, clearing firms, or others who have provided you with financial products or services.

Information We Disclose

We may disclose information about you, as described above, to our staff, affiliates, representatives, their affiliated businesses, non-affiliated third parties who provide you with financial products and services, and our service providers, such as a mailing company. These non-affiliated third parties may include retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies and agencies, other broker-dealers, and clearing firms. Our Privacy Policy is the same for current, as well as former clients. Also, if you close your account, in the process of transferring your investments, we may share your information with the new broker-dealer or custodian that you or your financial professional selects. We may disclose information such as your name, address, social security number, date of birth, transactional information, or other financial information, when necessary for us to provide you with financial products and services, or report on your account, or where disclosure is prescribed by law. For example, we report your tax-related information to federal and state governments, and we may disclose information during the course of an audit, or to law enforcement or regulatory agencies. We do not disclose your information to non-affiliated companies who intend to market their products to you. For example, we will not sell clients' names and addresses to a catalog or marketing company.

“Opting out” of Third-Party Disclosures

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some, but not all information sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information.

Federal law gives you the right to limit only:

- Sharing for affiliates' everyday business purposes – information about your creditworthiness
- Affiliates from using your information to market to you
- Sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. Sanctuary may utilize common information systems or databases to which employees of our affiliates may have access that could contain your information. However, such information will not be disclosed by a Sanctuary affiliate, except as permitted by law.

How We Protect Personal Information

To protect your personal information from unauthorized access and use, we use commercially reasonable technical and physical security measures that comply with applicable law. When we share information with third parties, we hold parties to commercially reasonable standards of privacy protection. We have policies designed to ensure only those persons who need your information to perform their job have access to it. In addition, we maintain physical, electronic, and procedural security measures that comply with applicable regulations to protect your information. We train our employees in the proper handling of personal information.

Additionally, we do not share mobile data, phone numbers or SMS consent with marketing services or with third parties.

Other Applicable Laws

The practices described are in accordance with Federal Law. We also follow privacy requirements under applicable state law. If a state's privacy laws are more restrictive than those stated in this policy, we comply with those laws.

Some state laws grant additional privacy rights to their residents. If you live in an "opt-in" state, where we are required to obtain your affirmative consent to share your non-public personal information with non-affiliated third parties who do not currently assist us in servicing your account or conducting our business, your financial professional is required to obtain your consent before they can take your information with them should they leave our firm.

California Residents:

We are required under the California Consumer Privacy Act of 2018 ("CCPA") and Cal. Civil Code § 1798, to provide California residents ("you" and "your") with certain information about how we collect, use and share personal information, and about the rights and choices that may be available to under the CCPA, with respect to personal information. (For purposes of this California Privacy Notice, "personal information" has the meaning given in the CCPA, as "information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.")

1. Personal Information that We Collect, Use and Share

The chart below summarizes how we collect, use and share personal information by reference to the statutory categories specified in the CCPA, and describes our practices during the 12 months preceding the effective date of this Privacy Notice.

Statutory Category	Information Collected	Sources of Information	Purposes of Collection	Disclosures to Third Parties
Identifiers (such as name, email, address, phone number, government ID numbers)	• Name • Contact information • ID information • Online registration information	• Submitted by you • Affiliates and business partners • Third parties • Public sources • Automated online or device collection	• Provide and develop our services • Communications • Marketing • Compliance and legal obligations • Internal business management	• Service providers • Affiliates and business partners • Professional advisors
Financial, medical or insurance information (such as payment cards, financial account numbers)	• Financial account information	• Submitted by you • Affiliates and business partners	• Provide and develop our services • Compliance and legal obligations • Internal business management	• Service provider • Affiliates and business partners
Characteristics of protected classifications under California or federal law (such as age, gender, race, citizenship)	• Citizenship and birth date are requested in the account opening process • Except for above, we generally do not specifically request this information, but such characteristics may be incidentally revealed by personal information collected in our usual business operations	• Submitted by you • Affiliates and business partners • Third parties • Public sources	• Provide and develop our services • Internal business management • Compliance and legal obligations	• Service providers • Affiliates and business partners • Professional advisors

Commercial activity and information (such as transaction history)	• Transaction and commercial activity conducted via our services	• Submitted by you • Affiliates and business partners • Third parties • Automated online or device collection	• Provide and develop our services • Communications • Marketing • Compliance and legal obligations • Internal business management	• Service providers • Affiliates and business partners • Professional advisors
Internet or network activity and information (such as usage and browsing data)	• Online activity data • Device Data	• Automated online or device collection	• Provide and develop our services • Marketing • Compliance and legal obligations • Internal business management	• Service providers • Affiliates and business partners
Professional or employment information	• Information about current or former employment and professional roles	• Submitted by you • Affiliates and business partners • Third parties • Public sources	• Provide and develop our services • Marketing • Internal business management • Compliance and legal obligations	• Service providers • Affiliates and business partners • Professional advisor
Geolocation data ¹	Not collected	N/A	N/A	N/A
Sensory information (such as photos, other recorded electronic information)	Not collected	N/A	N/A	N/A
Inferences drawn from any personal information collected	Not collected	N/A	N/A	N/A

¹ In this context, geolocation data refers to highly specific location data in time, and it does not refer to an address or general location information, such as may be derived from an IP address.

Other disclosures to third parties. In addition to the disclosures described above, we may disclose your personal information as necessary in the following circumstances:

- To fulfill our legal obligations, or to defend our or others' legal rights
- For purposes of compliance, fraud prevention and safety of individuals or property
- In the event of a business transaction or potential business transaction involving us, such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution

No sales of personal information. We do not sell any personal information, as "selling" is defined in the CCPA. In addition, it is our policy not to sell, rent or exchange your personal information with any third parties for those third parties' direct marketing purposes.

2. Your California Privacy Rights

As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your personal information during the past 12 months:
 - The categories of personal information that we have collected.
 - The categories of sources from which we collected personal information.
 - The business or commercial purpose for collecting and/or selling personal information.
 - The categories of third parties with whom we share personal information.
 - Whether we have disclosed your personal information for a business purpose, and if so, the categories of personal information received by each category of third-party recipient.
 - Whether we've sold your personal information, and if so, the categories of personal information received by each category of third-party recipient.
- **Access.** You can request a copy of the personal information that we have collected about you during the past 12 months.
- **Deletion.** You can request that we delete the personal information that we have collected from you.
- **Opt-Out.** You can direct a business that sells your personal information to cease selling your personal information.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination. This means that we will not penalize you for exercising your rights by taking actions such as denying you services; increasing the price/rate of services; decreasing service quality; or suggesting that we may penalize you as described above for exercising your rights.

3. How to Exercise Your Rights

If you are a California resident, you may make requests to exercise the privacy rights described above as follows:

- o By email at legal@sanctuarywealth.com

We will only respond to verifiable consumer requests, and we will need to confirm your identity to process and respond to requests to exercise privacy rights. As a part of this process, government identification or other information may be required. (If we collect additional personal information from you to verify a request, that personal information will only be used for verification.) Consistent with California law, you may designate an authorized agent to make a request on your behalf, and in that case we will need to appropriately confirm that the agent has been validly authorized, for example by confirming the authorization with you or by requiring a power of attorney. We also reserve the right to confirm your current California residency.

Please understand that we cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it. Please also understand that we are not obligated to provide you with a copy of personal information more than twice in a 12-month period.

4. Changes to this Privacy Notice

We may modify this California Privacy Notice at any time to reflect changes in our use of personal information. We will take appropriate steps to notify you of material changes to this Privacy Notice, which may include by email or notification through our services, or by updating this Privacy Notice and posting it to our website.

5. How to Contact Us

Please direct any questions or comments about this Privacy Notice or our privacy practices to legal@sanctuarywealth.com or Sanctuary Wealth, Attention: Legal, 3815 River Crossing Pkwy, Suite 200, Indianapolis, Indiana 46240.

Nevada Residents: We are providing you this notice, pursuant to Nevada law. If you prefer not to receive marketing calls from us, you may be placed on our Internal Do Not Call List by contacting your financial professional.

Vermont Residents: Under Vermont law, we will not share information we collect about Vermont residents with companies outside of Sanctuary, unless the law allows. For example, we may share information with your consent, to service your accounts or under distribution agreements with other financial institutions with which we have joint distribution agreements. We will not share information about your creditworthiness outside of Sanctuary except with your consent, but we may share information about our transactions or experiences with you in order to service your account with third parties (for example your Custodian) without your consent.

For Insurance Clients in AZ, CA, CT, GA, IL, ME, MA, MN, MT, NV, NJ, NC, OH, OR, and VA. "Personal information" means any individually identifiable information gathered in connection with an insurance transaction. We collect personal information about you from applications or other forms you complete, your business dealings with us and other companies, and consumer reporting agencies. We disclose your information in the following circumstances: as described on page 1 of this Privacy Notice; with your consent; to third parties where necessary to determine your eligibility for insurance benefits, process claims, detect fraud or non-disclosure; to insurance regulatory

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authorities; to law enforcement or other governmental authorities to protect our interests and to prevent fraud; to our service providers who process and maintain your account and coverages; and as otherwise permitted by law; The law allows us to share your financial information with our affiliates to market products or services to you. You cannot prevent these disclosures, except as stated in this Privacy Notice. We protect your non-public personal information. The only employees who have access to that information are those who must have it to provide products or services to you. You have the right to access, correct, amend, or delete personal information that we have recorded about you. In the event of an adverse underwriting decision, you have the right to submit a written request for the reason(s) for the adverse decision. To exercise these rights, please submit a written request to us at legal@sanctuarywealth.com.

Questions

If you have questions about our privacy policy, you may contact your financial professional, or you may contact us at: Sanctuary Wealth, Attention: Legal, 3815 River Crossing Pkwy, Suite 200, Indianapolis, Indiana 46240. You may also call us at (317) 975-7729 or contact us electronically at legal@sanctuarywealth.com.