

Our website address is: <https://northboundwealth.com>

Privacy Policy

Our commitment to privacy

Northbound Wealth Management LLC is committed to maintaining the confidentiality, integrity, and security of personal information about our current and prospective customers. In this policy, personal information means information about an individual that is collected or maintained for business purposes and by which the individual can be identified.

Please note that certain details of this policy may depend on whether you deal with us through an investment professional, directly as an individual investor, or whether Northbound Wealth Management LLC provides services to your employer or plan sponsor.

The privacy policies of Northbound Wealth Management LLC are reviewed annually. Our printed and online notices are then updated to reflect any changes.

Northbound Wealth Management LLC Privacy Policy

Northbound Wealth Management LLC recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. Northbound Wealth Management LLC will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information. We may use personal information about you to service, maintain, and protect your account; process transactions in your account; respond to inquiries from you or your representative; develop, offer, and deliver products and services; or to fulfill legal and regulatory requirements.

Northbound Wealth Management LLC may collect public and non-public personal information about you from any of the following sources:

- You or your representative on applications or forms (for example, name, address, Social Security number, birth date, assets and income)
- You or your employer or plan sponsor if Northbound Wealth Management LLC provides them with recordkeeping and/or benefits advisory services (for example, payroll, human resources, or benefits information)
- Transactional activity in your account (for example, trading history and balances)
- Other interactions with Northbound Wealth Management (for example, discussions with our customer service staff, information you enter into our websites, or when you enroll in our authentication services)
- Information from consumer reporting agencies (for example, to assess your creditworthiness for margin products)
- Information from other third-party data services (for example, to verify your identity and to better understand your product and service needs)
- You or your representative regarding your preferences (for example, your choice of electronic statement delivery, or the screen layout you specify if you use our Internet sites)
- Other sources with your consent or with the consent of your representative (for example, from other institutions if you transfer positions into Northbound Wealth Management LLC)

Please note that information by which you cannot be identified (for example, anonymous or aggregated information) is not considered personal information and therefore is not subject to this privacy policy.

Why We Collect Your Information

We gather information about you so that we can:

- Help design and implement the investment and planning related services we provide you; and
- Comply with the Federal and State laws and regulations that govern us.

How we protect information about you

Northbound Wealth Management LLC considers the protection of personal information to be a foundation of customer trust and a sound business practice. We employ physical, electronic, and procedural controls and we regularly adapt these controls to respond to changing requirements and advances in technology.

At Northbound Wealth Management LLC, we restrict access to personal information to those who require it to develop, support, offer and deliver products and services to you.

How we share information about you with third parties

Northbound Wealth Management LLC does not share personal information about our customers with unaffiliated third parties for use in marketing their products and services. Arrangements with companies or independent contractors not affiliated with Northbound Wealth Management LLC will be subject to confidentiality agreements.

We may share personal information with the following entities:

- Unaffiliated service providers (for example, printing and mailing companies, securities clearinghouses, marketing service providers, and other entities who may provide services at Northbound Wealth Management LLC's direction)
- Government agencies, other regulatory bodies and law enforcement officials (for example, for tax purposes or for reporting suspicious transactions)
- Other third-parties, with your consent or as directed by your representative (for example, if you use Northbound Wealth Management LLC as a financial reference in applying for credit with another institution or if you use an external aggregation website or service that you have provided permission to access your Northbound Wealth Management LLC financial account on your behalf)
- Other organizations as permitted or required by law (for example for fraud prevention or to respond to a subpoena)

Our service providers are obligated to keep the personal information we share with them confidential and use it only to provide services specified by Northbound Wealth Management LLC.

Based on the nature of your relationship with Northbound Wealth Management LLC, we may exchange information with other third parties as described below:

- If Northbound Wealth Management LLC provides workplace services to your employer or plan sponsor such as benefits advisory and/or recordkeeping services, Northbound Wealth Management LLC may exchange any information received in connection with such services with your employer or plan sponsor or others they may authorize.
- If you conduct business with Northbound Wealth Management LLC through your investment professional, we may exchange information we collect with your investment professional or with others they may authorize.
- If you transact business with life insurance companies where we may validate and obtain information about you from an insurance support organization. The insurance support organization may further share your information with other insurers, as permitted by law. We may also share medical information about you to learn if you qualify for coverage, to process claims, to prevent fraud, or otherwise at your direction, as permitted by law.

How we share information about you within Northbound Wealth Management LLC

We may share personal information about you with various Northbound Wealth Management LLC corporate affiliates including internal service providers which perform, for example, printing, mailing, and data processing services.

Additionally, if you interact with Northbound Wealth Management LLC directly as an individual investor (including joint account holders) or if Northbound Wealth Management LLC provides services to your employer or plan sponsor, we may exchange certain information about you with Northbound Wealth Management LLC financial services affiliates, such as our brokerage and insurance companies, for their use in marketing products and services as allowed by law.

“Opting-Out” of Third Party Disclosures: If you do not want your Financial Planner/Financial Adviser to retain copies of your client sensitive information when he or

she leaves us to join another firm, you may contact us by calling Northbound Wealth Management LLC at 317-399-1107.

Information collected from investment professionals' customers is not shared with Northbound Wealth Management LLC affiliates for marketing purposes, except with your consent and as allowed by law.

Your digital privacy

Privacy, security, and service in Northbound Wealth Management LLC's online operations are just as critical as in the rest of our business. We use firewall barriers, encryption techniques, and authentication procedures, among other controls, to maintain the security of your online session and to protect Northbound Wealth Management LLC accounts and systems from unauthorized access.

When you interact with us by using our websites, online services or mobile applications that are owned and controlled by Northbound Wealth Management LLC ("our digital offerings"), Northbound Wealth Management manages personal information in accordance with all of the practices and safeguards described previously.

When you use our digital offerings, we may collect technical and navigational and location information, such as device type, browser type, Internet protocol address, pages visited, and average time spent on our digital offerings. We use this information for a variety of purposes, such as maintaining the security of your session, facilitating site navigation, improving Northbound Wealth Management LLC website design and functionality, and personalizing your experience. Additionally, the following policies and practices apply when you are online.

Cookies and similar technologies

Northbound Wealth Management LLC and our third-party service providers may use cookies and similar technologies to support the operation of our digital offerings. Cookies are small amounts of data that a website or online service exchanges with a web browser or application on a visitor's device (for example, computer, tablet, or mobile phone). Cookies help us to collect information about users of our digital offerings, including date and time of visits, pages viewed, amount of time spent using our digital offerings, or general information about the device used to access our digital offerings. Northbound Wealth Management LLC cookies are also used for security purposes and to personalize your experience, such as customizing your screen layout.

You can refuse or delete cookies. Most browsers and mobile devices offer their own settings to manage cookies. If you refuse a cookie, or if you delete cookies from your device, you may experience some inconvenience in your use of our digital offerings. For

example, you may not be able to sign in and access your account, or we may not be able to recognize you, your device, or your online preferences.

Both Northbound Wealth Management and third-party service providers we hire may use cookies and other technologies, such as web beacons, pixel tags, or mobile device ID, in online advertising as described below.

Advertising on Northbound Wealth Management Digital Offerings

Northbound Wealth Management LLC advertises on its own digital offerings (including our mobile applications), and when we do, we may use information about your relationship with us, such as the types of accounts you have, to tailor advertisements and communications about Northbound Wealth Management LLC and third-party products and services that may be of interest to you.

We may also use third-party service providers to help us determine which Northbound Wealth Management LLC products and services may be of interest to you. These service providers may collect information about your activity on Northbound Wealth Management LLC digital offerings using cookies and other technologies to analyze, for example, pages visited, search engine referrals, browsing patterns, and responses to advertisements and promotions. Such service providers may only collect and use such information for purposes specified by Northbound Wealth Management LLC and not for their own purposes.

Advertising on Non-Northbound Wealth Management Digital Offerings

Northbound Wealth Management LLC also advertises our products and services on digital offerings not affiliated with Northbound Wealth Management LLC and we contract with third-party advertising companies to display these ads. These third-party advertising companies may use cookies and similar technologies to collect technical and web navigational information, such as device type, browser type, Internet protocol address, and pages visited.

Northbound Wealth Management LLC and these third-party online advertising companies may use the data collected, along with other information we have about you and your Northbound Wealth Management LLC relationships, to serve relevant ads to you. The advertisements may be relevant to your interests, as determined by your activity on Northbound Wealth Management LLC and non-Northbound Wealth Management LLC websites. These advertisements are known as “interest-based advertisements”.

You may opt-out of receiving interest-based advertisements from online advertising companies by clicking on the AdChoices icon (which appears on all Northbound Wealth Management LLC interest-based ads) and following the opt-out instructions. For more information about interest-based advertising please see http://www.networkadvertising.org/managing/opt_out.asp.

Connecting with Northbound Wealth Management LLC on social media platforms

Northbound Wealth Management LLC provides experiences on social media platforms that enable online sharing and collaboration among users who have registered to use them. We may collect information you provide by interacting with us via social media, such as photographs, opinions, or social media account ID. Any content you post, such as pictures, information, opinions, or any personal information that you make available to other participants on these social platforms, is also subject to the terms of use and privacy policies of those platforms. Please refer to them to better understand your rights and obligations with regard to such content.

Third Party websites and applications

Non-Northbound Wealth Management LLC websites and mobile applications (for example, social media platforms) are not subject to Northbound Wealth Management LLC's privacy policy. You may visit the individual sites for additional information on their privacy practices and advertising opt-out instructions.

Protecting children's privacy online

Northbound Wealth Management LLC websites are not directed to individuals under the age of thirteen (13). Northbound Wealth Management LLC does not intentionally collect information on Northbound Wealth Management LLC websites from those we know are under 13, and we request that these individuals do not provide personal information through the sites.

Additional information

If you are a former customer, these policies also apply to you; we treat your information with the same care as we do information about current customers.

Northbound Wealth Management LLC offers several options for accessing and, if necessary, correcting your account information. You can review your information using your statements, or through our automated telephone or Internet services. You may also write or call us with your request for information. If you transact business through Northbound Wealth Management LLC non-affiliated life insurance companies, you are entitled to receive, upon written request, a record of any disclosures of your medical record information. If we serve you through an investment professional, please contact them directly. Specific Internet addresses, mailing addresses and telephone numbers are listed on your statements and other correspondence.

Privacy has always been important to Northbound Wealth Management LLC. We restrict and limit access to client information only to those who need to carry out their business functions. We educate employees about safeguarding client information and preventing its unauthorized access, disclosure, or use. Employees will be required to acknowledge their acceptance and understanding of the privacy policy in writing. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information including, but not limited to the Northbound Wealth Management LLC Data & Cybersecurity Program.

The Northbound Wealth Management LLC privacy policy is provided on behalf of:

- Northbound Wealth Management, LLC
- Other companies owned by Northbound Wealth Management LLC using the Northbound Wealth Management LLC name to provide financial services to customers.