

## CONGRESS WEALTH MANAGEMENT COMPANY 2017 PRIVACY NOTICE

The trust and confidence of our customers is important to Congress Wealth Management. For this reason we are careful in the way we collect and handle non-public, personal information about our clients ("Client Information"). This Privacy Notice describes our policies and practices regarding Client Information and how it is obtained, disseminated, and protected.

### Information We Collect

We may collect Client Information from the following sources:

- Information we receive on contracts or other forms, such as name, address, date of birth, and social security number
- Information relating to transactions with us, our affiliates and others, such as the purchase and sale of securities and account balances
- Information we receive from third parties, such as custodians, brokers and financial services firms, as required or permitted by law

### Information We Disclose

We disclose Client Information about our present or former Clients to third parties only to the extent required or permitted by law. Such sharing of Client Information is applied to:

- Everyday business purposes such as processing transactions, maintaining and or servicing your account
- Cooperating with regulatory authorities, responding to court orders and legal investigations
- Taking reasonable and necessary steps to prevent fraud, unauthorized transactions, etc.

### Opting-Out

The information we disclose is limited, and essential to servicing your account, protecting your privacy and meeting obligations under state and federal law. We do not disclose Client Information requiring a notice to you for limiting such disclosure, otherwise known as "opting-out". However, should we wish to disclose additional Client Information of yours, we will only do so with your written permission as discussed below.

### Opt-In Process for Sharing Additional Client Information

Our current business practices require us to obtain from you affirmative written permission ("Opting-In"), before we disclose any Client Information outside of what is discussed above in the "Information We Disclose" section of this notice. In the event we wish to share such additional Client Information, we will provide you an Opt-In form describing the additional Client Information we seek to share, with whom we wish to share it with and for what purpose. Until such form is received by us from you, indicating your permission, such additional Client Information about you will not be shared.

### Information Security

- We maintain an Information Protection and Cybersecurity Program and provide awareness and train our employees
- We continue to evaluate our efforts to protect confidential Client Information and to keep our privacy policy and practices current
- We restrict access to Client Information to employees and service providers who are involved in providing products and services to our clients
- Employees with access to Client information may not use or disclose such information, except for Congress Wealth Management business use
- We maintain physical, electronic, and procedural safeguards in order to protect Client Information.
- When there is a need to dispose of confidential Client information, we require our employees to shred, not discard the information

If you have any questions regarding this Privacy Notice, please call or write to us at the information provided below.



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