

LULLA WEALTH FINANCIAL PRIVACY POLICY

LULLA is committed to safeguarding the confidential information of our clients. Our policy with respect to your personal information is as follows:

Information We Collect, and How We Gather Information: The information we collect is used in conjunction with the regular processing of business. We collect information about you from several sources. For example:

- Information you provide to us on applications and other forms, such as your name, address, telephone number, date of birth, social security number, employment, assets, income, passport, driver's license or other identification numbers.
- Information provided by your transactions, such as when you trade in your account or wire funds.
- Information provided to us by your custodian, third-party service providers, mutual fund and insurance companies, our Investment Advisor Representatives, your former Broker/Dealer and/or Registered Investment Advisor, and consumer reporting agencies about you, your account, and transactions in your account.
- Information about your account, including account type and account balances.

Information We Share with Others: LULLA does not share your personal information for marketing, or joint marketing purposes. Should this change, we will notify you prior to sharing any information. When available, we will offer you the ability to limit sharing of your personal information. LULLA only shares your information as is necessary to conduct business for your account, as follows:

- With our employees, Investment Advisor Representatives as needed to open, maintain and service your account(s).
- With unaffiliated third parties, such as your custodian(s), product sponsors, and banks in order to carry out your instructions.
- As required by law. For example, the firm may be required to respond to a subpoena, or a governmental or regulatory request.

Can I Limit Sharing? Federal law gives you the right to limit some forms of sharing:

- 1) Sharing for affiliates' everyday business purposes—information about your creditworthiness; and
- 2) Affiliates or non-affiliates from using your information to market to you. State laws and individual companies may give you additional rights to limit sharing. Check your state for more information on your rights under state law.

Protecting the Confidentiality and Security of Your Information: We have physical, electronic and procedural safeguards in place to protect the confidentiality of your personal information.

DEFINITIONS

- Affiliates: Companies related by common ownership or control. LULLA does not have any affiliated companies.
- Non-Affiliates: Companies not related by common ownership or control. LULLA does not share with nonaffiliates forthose companies to market to you.
- **Joint Marketing:** A formal agreement between non-affiliated financial companies that together, market financial products or services to you. LULLA does not maintain any joint marketing agreements.

OTHER IMPORTANT INFORMATION: Investment Advisor Representatives (IARs) may change investment advisory firms, and the nonpublic personal information collected by us and your IAR may be provided to the new firm so that your IAR can continue servicing your account(s). If you do not want your IAR to take or receive this information, please contact us at (772) 257-9803 to opt out of this sharing. Questions? Contact us at (772) 257-9803 or visit www.lullafinancial.com.