

FOR CALIFORNIA RESIDENTS

As used in this notice, “we,” “us,” “our” and “CTWM” means Connecticut Wealth Management, LLC. The term “website” refers to <https://ctwealthmgmt.com/>.

This Privacy Notice for California Residents (“CCPA Privacy Notice”) supplements the information contained in our privacy policy and applies solely to visitors, users, customers and others who reside in the State of California (“you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018, as amended (“CCPA”), and unless otherwise stated, any terms defined in the CCPA have the same meaning when used in this notice. Please take the time to read and understand our CCPA Privacy Notice.

Scope

This CCPA Privacy Notice governs certain information that we collect about you both offline and online. Note that because the CCPA includes certain exemptions related to the use or collection of personal information, not all personal information that we collect from you or about you is covered by the CCPA or this CCPA Privacy Notice. For example, as described below in ***Client Privacy Policy***, accessible at www.CTWealthMgmt.com information that we collect when providing a financial product or service to you—or when you are inquiring about receiving such from us as a prospective client—is not covered by the CCPA or this CCPA Privacy Notice.

The disclosures in this CCPA Privacy Notice govern our practices currently and over the last twelve months.

Notice to Clients and Prospective Clients

If you are a resident of the State of California and you seek to or have obtained a financial product or service from us, please read our **Client Privacy Policy** at which explains the types of nonpublic personal information we collect from you and how we share it, consistent with federal privacy laws applicable to financial institutions. **This CCPA Privacy Notice and the rights granted hereunder do not apply to the information we collect from you pursuant to our Client Privacy Policy.**

Categories of Personal Information We Collect

During the preceding 12 months we have collected the following categories and types of personal information:

- Identifiers such as unique personal identifiers, Internet Protocol address, device identifiers, online identifiers, cookies, web beacons, mobile ad identifiers, pixel

tags—and when provided—name, postal address, email address and phone number.

- Internet or other electronic network activity information such as browsing history, search history and information regarding your interaction with a website, application or advertisement.
- Inferences drawn from other personal information. In other words, the categories of information described above may be combined or analyzed in such ways to make additional inferences on individuals from the information we collected.

Sources From Which We Collect Your Personal Information

We collect the categories of personal information set out above from the following sources:

- Automatically or, where applicable, with your consent, when you visit our website or interact with emails you receive from us. We may receive such information directly from you or indirectly, such as from vendors we have engaged to assist us with website analytics, online tracking and advertising and other services.
- Via our website.
- From communications with you.
- Direct mailings to which you choose to respond.

The Purposes for Which We Collect Your Personal Information

We use personal information collected for the following purposes:

- Data analytics to improve the services and products we offer, to learn about the interests of visitors to our website for marketing purposes like identifying prospective clients, to communicate with you about additional products and services in which you may be interested and to enhance client relationships and experiences.
- Statistical monitoring, including to estimate our audience size and usage patterns, store information about your preferences and recognize you when you visit our website.
- Delivery of relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we deliver to you. Please see **Online Tracking and Advertising** below for further information.
- Provision of tailored experiences about our products and services to you.
- Carrying out our obligations and enforce our rights arising from any contracts entered into between you and CTWM Partners, including for billing and collection, and as we believe is necessary or appropriate to protect, enforce or defend the legal rights, privacy, safety or property of CTWM Partners, its employees or agents, or other users or to comply with applicable law.

- Communications with you, including to notify you about changes to our services or products.
- In any other way we may describe when you provide the information, or otherwise at your direction or with your consent.
- As permitted by law or as we may notify you.

How and With Whom We Share Your Personal Information

We share your personal information with the following categories of third parties:

- Third parties that provide the cookies and other tracking applications that our Website uses. **Sale of Personal Information to Third Parties** below provides additional information on what we share, with whom and how you may limit such. Our service providers, business partners and vendors on which we rely to, for example, assist us in providing the services or products to you and understanding the needs and demands of our clients, prospective clients and visitors to our Website.
- Regulatory, government and other legal entities when required to do so by law, for example, in response to a court order or a subpoena. We also may disclose such information in response to a law enforcement agency's request.
- With other non-affiliated parties if we or any of our affiliates, subsidiaries or lines of business are merged, acquired, divested, financed, sold, disposed of or dissolved, including through merger, consolidation, sale or divestiture of assets. In such circumstances, any personal information we may possess about you, may, in whole or in part, be sold, disposed of, transferred, divested, or otherwise disclosed as part of that transaction or proceeding.

In the past twelve months, we have disclosed the following categories of personal information for business purposes to third parties and services providers:

- Unique personal identifiers
- IP address
- Device identifiers
- Online identifiers
- Cookies
- Web beacons
- Mobile ad identifiers
- Pixel tags
- Name (if you chose to provide it)
- Address (if you chose to provide it)
- Email address (if you chose to provide it)
- Phone number (if you chose to provide it)

In the past twelve months, we have not “sold” your personal information in exchange for money to any third party or service provider. Information provided to third parties does not contain information sufficient to identify you. In certain cases, information to identify individuals is provided to service providers pursuant to restrictions on use, additional sharing with other third parties and confidentiality commitments. For more information on sharing and sales practices with respect to personal information, see **Sale of Personal Information to Third Parties** below.

Sale of Personal Information to Third Parties

CTWM Partners does not sell your personal information to third parties and / or service providers in exchange for money, but such sharing may constitute a sale of information under the CCPA. Therefore, California residents should note the following:

- CTWM Partners shares data collected through our Website’s use of cookies with the providers of those cookies. In return, we generally receive access to the data that was collected and shared in an organized format along with analysis of the data. Under the CCPA, many of these technology providers are considered third parties, and thus the sharing may constitute a sale. As mentioned above, (1) no monetary consideration is received by CTWM Partners and (2) in most cases, the visitor data shared is not sufficient to reasonably identify the visitors because names, addresses, phone numbers or email addresses are not collected by the cookies and other tracking technologies.
- CTWM Partners shares data collected through our Website’s use of cookies and through data entered by the visitor. CTWM Partners may share that information with service providers hired by CTWM Partners to analyze and organize the data as described in **The Purposes for Which We Collect Your Personal Data**. With respect to visitor data shared with service providers, CTWM Partners and / or the service provider may be able to link particular visitor data with a particular individual.

If you would like to limit or prevent CTWM Partners from collecting personal data during your visits to our Website and subsequent sharing with third parties or service providers, please [click here](#) to access our “Do Not Sell My Info” feature.

Online Tracking and Advertising

We and the service providers or partners we engage to provide content, advertising, functionality and other services or that measure and analyze ad performance on our Website may use cookies, web beacons and other similar technologies to understand usage of our Website and improve our content and offerings and to deliver advertisements in which you might be interested. Some of the tracking technologies we and our service providers or partners may use include:

Cookies. Cookies are small text files that may be placed on your computer or device when you visit our website or applications. Cookies assign a unique numerical identifier to your web browser or device and may enable us or third parties to recognize you as the same user who has visited our Website and relate your use of our Website to other information about you, like your usage information and personal information. We may use cookies in a variety of ways. For example, we may use cookies to:

- Provide us with information about which portions of our Website and applications are the most popular by enabling us to see what web pages a user visits and how much time a user spends on each page.
- Personalize your experience on our Website.
- Help us understand which ads you have seen so that you don't receive the same ad each time you access our Website.

Categories of Cookies Used on Our Website

Below we list the different types of cookies that may be used on our Website.

Strictly Necessary Cookies. These cookies enable you to navigate our Website and to use their features. These cookies are necessary for our Website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you that amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the particular website may not work. These cookies do not store any personally identifiable information.

Performance Cookies. These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our Website. They help us to know which pages are popular and see how visitors move around our Website. If you do not allow these cookies, we will be less able to optimize our Website's performance. All information these cookies collect is aggregated and anonymous.

Targeting Cookies. These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant advertisements on other sites. If you do not allow these cookies, you will experience less targeted advertising. These cookies do not directly store personal information but are based on uniquely identifying your browser and internet device.

Local Shared Objects. Local shared objects, such as "Flash cookies," also may be stored on your computer or device. Local shared objects operate a lot like cookies because they are stored on your device and can be used to store certain information about your activities and preferences; however, they cannot be managed in the same way as cookies. Depending on how local shared objects are enabled on your computer or device, you may

be able to manage them using software settings. For information on managing Flash cookies, for example, see <http://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html>.

HTML 5. HTML5, the language some websites are coded in, may be used to store information on your computer or device about how you use our Website. This information may be retrieved by us to help us manage our Website, and may give us information about how our Website are being used by our visitors, how they can be improved, and how we can customize our Website for users.

Cache Cookies. Cache cookies, such as eTags, may be used to identify your computer or device as the same computer or device that visited our Website in the past.

Web Beacons. A web beacon is an electronic image called a single-pixel, or “clear gif.” It is a small piece of code that is used to collect anonymous and aggregate advertising metrics, like the counting of page views, promotion views or advertising responses. Web beacons can recognize certain types of information, like a user’s cookie number, time and date of a page view, and description of the page where the web beacon is placed. These web beacons may be used to deliver cookies that conform to our cookie policy above.

Social Media Features. Our Website may use social media features, such as the Facebook “like” button (“Social Media Features”). These features may collect your IP address and which page you are visiting on our Websites, and may set a cookie to enable the feature to function properly. You may be given the option by such Social Media Features to post information about your activities on our Websites to a profile page of yours that is provided by a third-party social media network in order to share with others within your network. Social Media Features are either hosted by a third party or hosted directly on our Websites. Your interactions with these features are governed by the privacy policy of the company providing the relevant Social Media Features.

Mobile Device IDs and Location-Based Information. Certain mobile devices, including smart phones and tablet devices, contain unique device IDs that can be used to identify their physical location. Some mobile device IDs are permanent, while others may be changed by accessing the device’s privacy settings. Mobile devices also typically transmit caller ID data (which may include a phone number) when used to transmit a telephone call or text message. When you use mobile devices to access our Websites, we may collect and transmit unique device IDs and collect caller ID data, as well as other information about your device, including without limitation, your wireless carrier, the make, model, operating system, capacity and settings of your device, the names, package IDs and versions of other software you have downloaded to your device and information about how you interact with and navigate within our Websites.

These tracking technologies may be deployed by us and/or our by our service providers or partners on our behalf. These technologies enable us to assign a unique number to you, and may allow us to relate your use of our Websites to other information about you, including your usage information and personal information. We may match information collected from you through different means or at different times and combine such information with information obtained from other sources (including third parties), such as demographic information and updated contact information (where that information has been lawfully disclosed to us), for the purposes of learning more about you so we can provide you with relevant content.

How to Manage Preferences Related to Online Tracking and Advertising

Our Websites include a “Do Not Sell My Info” feature that enables you to opt-out or back in to certain categories of cookies and other tracking technologies. Please note that if you choose not to accept cookies from us, you may miss out on certain features of our platform.

Do Not Track Requests

Some internet browsers have incorporated “Do Not Track” features. When turned on, these features send a signal (“the DNT Signal”) to websites indicating you do not want to be tracked. CTWM Partners does not recognize the “do not track” signals that some browsers may employ as no uniform standard for responding to such signals has been developed at this time.

Your Rights as a California Resident

As a California resident, you have certain rights in relation to your personal information.

You have the **right to request that we disclose certain information to you** regarding how we have collected, used and shared your personal information over the last twelve months. Specifically, you have the right to request that we disclose the following information to you:

- The categories of personal information we have collected about you;
- The specific pieces of personal information we have collected about you;
- The categories of sources from which we have collected your personal information;
- The business or commercial purpose for which we collect or sell your personal information;
- The categories of third-parties with whom we share your personal information;
- The categories of personal information that we disclosed for a business purpose and the categories of third parties to whom your personal information was disclosed for a business purpose.

You have the **right to request that we delete the personal information that we have collected from you**, and, under certain circumstances, we must delete your personal information and direct any service provider to delete your information from its records.

You have the right to request that we do not sell your data. To exercise this right, please use our “Do Not Sell My Info” feature that enables you to opt-out or opt-in of certain categories of cookies and other tracking technologies.

Other Rights. You can request certain information about our disclosure of personal information to third-parties for their own direct marketing purposes during the preceding calendar year. This request is free and may be made once a year.

Right to Non-Discrimination

CTWM Partners may not discriminate against you if you choose to exercise your rights under the CCPA.

How to Exercise Your California Privacy Rights

Only you or a person registered with the California Secretary of State who you authorize to act on your behalf may make a verifiable consumer request related to your personal information. If your child is a minor, you may make a verifiable consumer request on their behalf. We will not respond to rights requests from non-California residents.

If you wish to exercise any of your California privacy rights, please submit a request to us via info@ctwealthgmt.com or call us at (860) 470-0290.

Note that the CCPA includes certain exemptions with respect to a businesses’ use or collection of personal information. Your rights under the CCPA may be limited as a result of our reliance on these exemptions.

Verifying and Responding to Your Requests

We only respond to requests that you make which are “verifiable” and for which we can reasonably verify your identity. To verify your requests, we may require authentication that is reasonable in light of the nature of the personal information requested.

We aim to promptly verify your requests and respond to your requests within 45 days of receipt, but may require up to a total of 90 days to respond to your requests. If we require additional time beyond the initial 45 days and that time is reasonably necessary, we will let you know within the first 45 days. We do not ordinarily charge a fee for our response to your requests. However, we may do so to the extent your request(s) are excessive, repetitive or manifestly unfounded. If we determine that charging a fee is warranted, we

will let you know and will provide you with an estimate of the associated costs of responding to your request(s). If we determine that we cannot or will not take the action that you requested, we will inform you of our reasons for not taking action and any rights you may have to appeal the decision.

We are not required to provide you access to your personal information more than twice in any 12-month period. Similarly, we are not required to comply with your requests that we disclose certain information to you more than twice in any twelve-month period.

Changes to Our CCPA Privacy Notice

From time to time, CTWM Partners may update or revise this CCPA Privacy Notice. If there are changes to the terms of our CCPA Privacy Notice we will post such changes on our website.

How to Contact Us

Please feel free to contact us at (860) 470-0290 or by email at info@ctwealthmgmt.com if you have any questions related to this CCPA Privacy Notice.

Effective Date & Recent Revisions

This policy is effective July 2024.