

## CONNECTICUT WEALTH MANAGEMENT LLC WEBSITE PRIVACY POLICY

This Website Privacy Policy (“Policy”) describes how Connecticut Wealth Management, LLC (“CTWM,” “we,” “our” or “us”) will use and share the information that we collect or receive from or about you when you visit our website: <https://ctwealthmgmt.com/> (“Website”). This Policy does not apply to other third-party services, Website and applications accessed by or through our Website.

We are committed to protecting your personal information. If you have any questions or concerns about this Policy, or our practices with regards to information we collect from or about you, please contact us at [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com).

Please read our Policy carefully. By using our Website, you consent, where required, to the use and sharing of the information we collect and receive as described below.

California residents should review our CCPA Privacy Notice, for additional rights that apply to California residents. Please note that terms used on this page may differ in meaning when used in our CCPA Privacy Notice.

### **Information We Collect**

We collect information about you in various ways. For example, you may provide personal information directly to us, we may collect certain information about you automatically through your use of the Website, or we may obtain information about you from third-parties who are acting on our behalf.

### Information You Provide to Us

When you interact with us through our Website, we may collect or receive information about you. For example, you provide information to us when you register for access to our special reports, podcasts, webinars, etc., when you express an interest in obtaining information about us or our wealth management services, or when you browse any of our Website.

Generally, you control the amount and type of information you provide to us when using our Website. Some of the information you provide to us is “personal information.” The personal information that we collect from you depends on the context of your interaction with us and our Website, the choices you make when you use our Website, and the materials you request. The personal information we collect or receive may, for example, include the following:

- Name
- Job title

- Telephone number
- Address
- Email address
- Webpages visited during your visit or visits to our Website
- Content requested via our Website
- Financial information that you choose to provide

### Information We Collect Automatically

When you use our Website and services related to our Website, such as when you visit our web pages, open our emails or otherwise use the services and content related to our Website, we automatically collect certain information about you. Automatically collected information may, for example, include the following:

- The type of browser and operating system you are using.
- The domain name of your Internet service provider.
- Your Internet Protocol address or mobile device identifier.
- Information about the content you view and the features you access through or from our Website, including your activity and behavior on our Website.
- Information regarding when you visited our Website, including information regarding the duration of your engagement with certain aspects of our Website.

This data may be combined and linked with data from other sources.

### **Use of Third-Party Cookies**

Our Website use cookies and other technologies created by third-party service providers to create the full experience of your visit to our Website, as well as to provide us with data on Website visitation and usage, and to provide interest-based advertising to visitors of our Website. These cookies and other tracking technologies collect information about you when you use our Website. The information collected may be associated with other information about you and about your online activities over time and across different Website and other online services. These third-party service providers may use this information to provide you with interest-based (behavioral) advertising or other targeted content. You understand that these tools are created and managed by parties outside our control. As a result, we are not responsible for what information is actually captured by these third parties or how they may use and protect that information.

To learn more about the types of cookies and tracking technologies that our Website use, please see the **Online Tracking & Advertising information** below.

## How We Use Information

We may use the information collected pursuant to this Policy in the following ways:

- To operate and provide our Website' services to you, or to fulfill any other purpose for which you provide us with information.
- To deliver the information, products or services you have requested from us.
- To create and share aggregate statistics and reports regarding visitors to our Website and recipients of emails containing request materials and information.
- To deliver and target advertising to you, including personalized advertisements.
- To reach out to you about and promote to you new information, products or services that we believe you may be interested in.
- To help us to improve our Website and to deliver a better and more personalized experience, including by enabling us to estimate our audience size and usage patterns, store information about your preferences, and recognize you when you use our Website.
- To deliver targeted advertising to you. Please see the **Online Tracking & Advertising** section below for further information about our and third parties' use of cookies, web beacons, mobile ad identifiers and other tracking technologies to provide you relevant ads, as well as information about how to disable cookies and make other choices related to targeted advertising.
- With respect to information collected in connection with our online forums and communities, to provide an interactive experience and facilitate participation in these online forums and communities and, from time to time, to offer you products, programs or services.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us , including for billing and collection, and as we believe is necessary or appropriate to protect, enforce or defend the legal rights, privacy, property, our employees or agents, or other users or to comply with applicable law.
- To communicate with you, including to notify you about changes to our Website.
- 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 We Share Information

We may share the information that we collect about you or that you provide to us, including any personal information, as follows:

- We may share your information with our service providers, business partners and vendors on which we rely, for example, to assist us in responding to requests you make of us through our Website or related email correspondence. These third

parties use your information as is necessary or appropriate for the performance of the services they provide to us, or as otherwise contractually permitted.

- We may share your information, including information that is combined with outside records, with third parties who provide services to us, such as direct marketing services, in order to enhance our ability to market to you those products or services that may be of interest to you.
- The providers of the cookies—and other tracking technologies—used on our Website generally receive the information collected through these cookies. These providers may use this data for their own purposes.
- When you make requests through our Website, we will share your information to the extent necessary to fulfill your request.
- We will disclose information we collect about you 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.
- We may transfer your information to other offices of CTWM and our affiliates for internal management and administrative purposes on our behalf. Your personal data will be transferred to other CTWM offices where necessary for the performance or conclusion of our contractual obligations to you or for your benefit. To the extent not prohibited under applicable law, transfers and disclosures of your information may also be made where necessary for the establishment, exercise, or defense of legal claims, to protect the rights and property of CTWM and its affiliates and their respective agents, customers, and others, including to enforce our agreements, policies, and terms of use, or to protect the personal safety of any person.

In addition, please note that if CTWM or any of its affiliates, subsidiaries or lines of business is merged, acquired, divested, financed, sold, disposed of or dissolved, including through merger, consolidation, sale or divestiture of assets, the relevant customer database, including 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.

### **Accessing, Correcting, and Deleting Your Personal Information**

We take reasonable steps to accurately record the personal information that you provide to us pursuant to this Policy and any subsequent updates to such information. To the extent that particular information collected is available to you, you may review, update, and correct the personal information that you provide to us pursuant to this Policy. Please contact us at [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com) in order to do so. Where possible, we will make reasonable efforts to accommodate such requests.

### **Online Tracking and Advertising**

We and 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, such as 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 each of our Website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which 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' 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 similar to 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 Website 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, such as the counting of page views, promotion views, or advertising responses. Web beacons can recognize certain types of information, such as 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 Website 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 Website 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 Website. 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 Website, 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 Website.

These tracking technologies may be deployed by us and/or 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 Website 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), like 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.

### **Accepting & Blocking Cookies**

Most browsers automatically accept cookies. You can set your browser options so that you will not receive cookies and you can also delete existing cookies from your browser. However, you may find that some parts of our Website will not function properly if you have refused cookies or similar tracking technologies and you should be aware that disabling cookies or similar tracking technologies might prevent you from accessing some of our content.

### **"Do Not Track" Signals**

Some internet browsers have incorporated "Do Not Track" features. When turned on, these features send a signal ("the DNT Signal") to Website indicating you do not want to be tracked. CTWM 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.

### **Links to Third-Party Website**

Our Website—on which a link to this Policy appears—contain links to third-party sites and services whose privacy practices may be different than ours. We also allow you to connect with other third-party sites and services. We are not responsible for the privacy practices of third-party sites and services and you should consult the other third-party sites' and services' privacy notices in order to better understand their privacy practices.

## **Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications on our Website may be served by third parties. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with other information about you and about your online activities over time and across different Website and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. You understand that such tools are created and managed by parties outside our control. As such, we are not responsible for what information is actually captured by such third-parties or how such third-parties use and protect that information.

## **Security**

We have put in place reasonable administrative, technical and physical safeguards to help prevent unauthorized access, maintain data security and correctly use the information we collect from and about you. However, no system can be completely secure and we do not guarantee that unauthorized disclosures and access will not happen. Although we take reasonable measures to safeguard against unauthorized disclosures of information, we cannot assure you that your personal information or other information will never be disclosed in a manner that is inconsistent with this Policy.

## **Notice to California Consumers**

If you are a California resident, you may have certain additional rights. California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by CTWM to third parties for the third parties' direct-marketing purposes. To make such a request, please [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com) or call (860) 470-0290.

## **Children's Privacy**

Our Website are not intended for users under the age of 13, and CTWM does not knowingly collect information from anyone under the age of 13. No one under the age of 13 is permitted to access or use our Website or to provide CTWM with personal information except as provided by their parents during the course of seeking investment management services.

## **Non-U.S. Visitors**

Any information we obtain about you in connection with your use of our Website may be processed and stored in the United States or other countries.

## **Changes to this Policy**



This Website Privacy Policy may be changed by CTWM or its affiliates at any time and such changes will apply to information we collected from you pursuant to a previous privacy policy. The revised Website Privacy Policy will be posted on the appropriate portion(s) of our Website and will indicate at the bottom when it was most recently updated. We encourage you to periodically check back to review this policy so that you know what information we collect, how we use it and with whom we share it.

### **How to Contact Us**

If you have any questions or concerns about this Policy or its implementation, please contact us at [info@ctwealthmgmt.com](mailto:info@ctwealthmgmt.com).

*This Policy was last updated on July 2024.*