



councilor

WEALTH

Councilor Wealth, LLC (Councilor Wealth)

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PRIVACY POLICY

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives the customer the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information, Financial Account Numbers and/or Balances, Sources of Income, and Credit Card Numbers. When you are no longer our customer, we may continue to share your information only as described in this notice.

INFORMATION WE DISCLOSE

We may only disclose information that we collect in accordance with this policy. Councilor Wealth does not sell customer lists and will not sell your name to telemarketers.

PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisers may need to share personal information to run their everyday business. In the section below, we list the reasons that we may share your personal information:

- For everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus;
- For our marketing – to offer our products and services to you.

We will not share your personal information for the purposes listed below:

- For joint marketing with other financial companies;
- For non-affiliates to market to you.

Clients may opt out of sharing information for joint marketing to other financial companies, to our affiliates and to non-affiliates in the future. If you are a new client, we may begin sharing your information on the day you sign our agreement. When you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

HOW WE USE YOUR INFORMATION

Information may be used among companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants, and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- To protect your accounts/non-public information from unauthorized access or identity theft;
- To process your requests such as securities purchases and sales;
- To establish or maintain an account with an unaffiliated third party, such as a clearing broker-dealer providing services to you and/or Councilor Wealth;
- To service your accounts, such as by issuing checks

- and account statements;
- To comply with Federal, State, and Self-Regulatory Organization requirements;
 - To keep you informed about financial services of interest to you.

REGULATION S-AM

Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. Councilor Wealth does not receive information regarding marketing eligibility from affiliates to make solicitations.

REGULATION S-ID

Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to customers or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect potential red-flags to prevent and mitigate identity theft.

PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and

secured files and building.

FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING - OPTING OUT

Federal law allows you the right to limit the sharing of your NPI by "opting-out" of the following: sharing for non-affiliates' everyday business purposes - information about your creditworthiness; sharing with non-affiliates who use your information to market to you; or sharing with non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.

CYBER SECURITY

Internal policies and procedures are in place to address cyber security. A copy of this policy is available upon request.

DEFINITIONS: Affiliates - companies related by common ownership or control. They can be financial and non-financial companies; Non-affiliates - companies not related by common ownership or control. They can be financial and non-financial companies; Joint marketing - a formal agreement between non-affiliated financial companies that together market financial products or services to you.

CHANGES TO THIS PRIVACY POLICY

If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Councilor Wealth, LLC, 7910 Woodmont Ave, Suite 500, Bethesda, MD 20814, (301)-986-0600.

Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.