

# Privacy Policy

This Privacy Policy details important information regarding the use and disclosure of user information collected by Campbell Private Wealth Management, LLC (“Campbell”) through its web sites or in connection with the services provided by Campbell to you. Campbell provides this Privacy Policy to help you make an informed decision about whether to use or continue using the web sites or Campbell’s services and those of any of its underlying service providers (the “Services”). Your use of the Services and any personal information you provide in connection with your use of the Services remains subject to the terms of this Privacy Policy and our Terms of Service. Campbell operates on the principle that your data belongs to you. You are not transferring the ownership of data about you or your clients by storing it through the use of the Services, notwithstanding any conflict in policy of third-party systems which comprise the Services. Your clients remain your own, and the data that you store therein belongs to you.

We utilize the data in your individual Campbell account to assist you with support requests, troubleshoot problems, or monitor the performance and effectiveness of the Services. In addition, we utilize aggregated data across the entire Campbell platform to improve its effectiveness, develop insights, or monitor the performance and effectiveness of the system.

We may collect the following types of information:

- Information you Provide. When you establish an account with Campbell, we ask you for personal information, which may include your name, address, email address, phone numbers and other personal information provided by you. We use the data you enter to provide the Services to you and develop personalization of the Services. We also analyze all of our customer data in aggregate to understand more about the average Campbell user.
- Contact Information. You may be asked for your email address or other personal contact information, which we will not share or sell to third parties.
- When you visit a Campbell web site, we send one or more cookies to your computer or other device. We use cookies to improve the quality of the Services, store user preferences and track user trends.
- Log Information. When you access the Services, our servers automatically record certain information in an industry-standard way. These logs may include information such as your web request, your interaction with a service, Internet Protocol address, browser type, browser language, the date and time of your request and one or more

cookies that may uniquely identify your browser or your account. We use logs to improve the quality of our Services, debug problems, and track user trends.

- User Communications. Any messages, email or communications that you send to Campbell may be retained so that we can process your inquiries, respond to your requests or improve the quality of our Services. We may use your email address and other personal contact information to communicate with you about our Services.
- Affiliated Campbell services delivered through other sites. Some of the Services may be offered through other third-party web sites. Your use of those web sites is subject to such third-party privacy policies, but if information that you send to those sites is shared with Campbell in order to deliver the Services, we process that information under this Privacy Policy.
- Other sites. This Privacy Policy applies to the Services provided by Campbell only. We do not have any control over the web sites offered by our partners, or sites that integrate Campbell services. Those sites are governed by their own privacy policies, which you should read before using them.
- Aggregated/Anonymous Information. Campbell may also collect user information on an aggregate or anonymous basis, which shall not personally identify you, and disclose the aggregate or anonymous data to prospective partners or other outside parties for their use. Campbell may also use this aggregate or anonymous information for various other business purposes, including without limitation, the creation and sale of other products to our customers and potential customers. This aggregate or anonymous information is not traceable to any particular user and will not be marketed or sold by Campbell as a means for a third party to contact you.

Campbell processes personal information on our servers in the United States of America, and may do so in other countries. In some cases, we may process personal information outside your own country.

Campbell only shares personal information with other companies or individuals outside of our company in the following limited circumstances:

- Necessary use of Services. We may make available the necessary information to third-party systems to discharge the Services which comprise the Campbell platform, each of which is governed by its own Privacy Policy.
- We have your consent. We require opt-in consent for the sharing of any confidential personal information.
- You integrate your Campbell account with a third party service or technology, which would have the effect of granting that service access to your confidential data via our API.
- You are an enterprise customer or partner, have contributed confidential holdings or securities data to the Campbell Services, and have provided a mapping of your

advisor's rep codes or other identifiers to their email addresses. In that case, we will only share your confidential data as requested with those advisors.

- We may, but as of this writing do not, provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons, solely for the purpose of processing that information on our behalf. We require that these parties agree to process such information based on our instructions, in compliance with this Privacy Policy, and utilizing similar confidentiality and security measures. We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce any applicable Terms of Service, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against harm or damages to the rights, property or safety of Campbell, its users or the public as required or permitted by law. If Campbell is ordered by a legal process or government to provide data about one or more individual users, we will notify those users of our compliance with that order, to the extent permitted by law.
- If Campbell becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will ensure the confidentiality of any personal information involved in such transactions and provide notice before personal information is transferred and becomes subject to a different privacy policy.

Campbell believes that your data belongs to you, and therefore you may delete your account and its related data at any time that you choose. To request that your account be deleted, please contact us at [info@at-pw.com](mailto:info@at-pw.com). Because of the way we maintain the Services to protect the integrity of your data, residual copies may take a period of time before they are completely erased, and your data may remain in our backup systems, or in the backup systems of underlying or affiliated service providers. However, our systems are architected so that your data will drop out of active use for all of the uses that we described above.

Please note that this Privacy Policy may change from time to time. We will post any changes to the policy at <https://campbellprivatewealth.com/privacy> and, if the changes are significant in our judgment, we will provide an email notification of such changes. Your continued use of the Services or the web site following the posting of any changes to the policies constitute your acceptance of the amended Privacy Policy. If you have any questions about our Privacy Policy, please contact us at [info@at-pw.com](mailto:info@at-pw.com). This document was last updated on May 24, 2024.