

EUROPEAN PRIVACY POLICY

ADDENDUM

PPW is responsible for ensuring that it uses European Client Personal Data in compliance with the General Data Protection Regulation (GDPR) and applicable data protection laws. The GDPR aims primarily to give control to citizens and residents over their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU.

1. Definition of Personal Data

Personal Data encompasses any information relating to a living individual that directly or indirectly identifies the individual. These include references by which the individual may be identified such as the individual's name, identification number, location data, online identifier or factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual. Personal data does not include data that has been rendered in such a way that an individual cannot be identified from the data, such as aggregate data.

2. Rights of the Client

We will take commercially reasonable steps to protect Client Personal Data from loss, misuse and unauthorized access, disclosure, alteration or destruction. For more information on how personal data is stored, please refer to PPW's Written Supervisory Procedures which include a cybersecurity policy

No Personal Data may be processed by PPW, its data controllers or its data processors unless it is done under a lawful basis specified by the GDPR or another relevant regulation. You have the following rights regarding the Personal Data we obtain from you:

- I. Right to Erasure. It is PPW's duty to erase and cease further dissemination of your Personal Data upon written notice without undue delay in the following circumstances:
 - a. The Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
 - b. There are no overriding legitimate grounds for processing the Personal Data
 - c. The Personal Data has been unlawfully processed;
 - d. The Personal Data must be erased to comply with a legal obligation in EU or Member State law to which PPW or its data controller is subject; or
 - e. You requested to restrict processing of the Personal Data within the terms of 2(III).

PPW, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the Personal Data that clients have requested the erasure by such controllers of any links to, or copy or replication of, those Personal Data. However, you should note that controllers have the right to compare your right of erasure to the public interest in the availability of the data.

- II. Right to Access. Clients may obtain access to Personal Data held by PPW, knowledge of whether or not it is being processed, and, if applicable, where it is processed and for what purpose.
- III. Right to Change Controllers. You have the right to change the controller that processes Personal Data. Upon request, PPW will attempt to the best of its ability, taking into consideration the overall performance and benefits of its data processing systems and data controllers, to enable you to change the controller for your Personal Data. If not possible, you may erase your personal data according to 2(I) or restrict the processing of your Personal Data according to 2(IV).

- IV. Right to Restrict Processing. Clients may request to restrict the processing of their Personal Data except in cases where processing is necessary for compliance with a legal obligation to which PPW or its data controller is subject, or for the establishment, exercise or defense of legal claims.
- V. Right to Rectify. Clients may request to rectify their Personal Data if it is inaccurate or incomplete.
- VI. Breach Notification. PPW will notify you within 72 hours of becoming aware of any data breach where your individual rights may be affected.

3. The Types of Personal Data that May Be Collected

We may collect the following types of Personal Data:

- I. Information needed to provide our firm's services as an investment adviser. Our firm will collect from you the Personal Information required to advise on your account. This includes basic Personal Information such as name, residence, age and occupation, and Personal Information that is obtained from the you that is incidental to the provision of investment advice, such as your income, investment goals, financial affiliations and/or any other information that would affect the suitability and/or execution of financial advice given. In entering into a service agreement with PPW and completing the associated account paperwork, you opt in to providing PPW with this information.
- II. Email Address. PPW will collect your email address. Your email address will be used to deliver your confirmation emails when you make a payment or renewal emails when your agreement with PPW is about to expire. Your email address is also stored for the purposes of maintaining our mailing list and handling bounced emails.

Your email address may also be used by our firm to send you marketing solicitations from our firm. Our firm will only use your email address for this purpose if you opt in by initialing _____ (**Client Initial Here**) _____ (**Client Initial Here**). You may opt out at any time from receiving marketing solicitations by sending an email requesting as such to info@pasadenapw.com.

Password. Your email address and password allow unique identification for you to log on to third party websites available on PPW's website. PPW recommends that clients obtain a copy of the third-parties privacy policy.

- III. Information we generate about you. Our firm will collect Personal Data with the purpose of documenting our interactions with you and improving Client experience. This may include records of our meetings with you, call recordings, emails exchanged and website usage data.
- IV. Information we obtain from public sources. Our firm may also obtain Client Personal Data from public sources, such as public websites and records.

_____ (**Client Initial Here**) _____ (**Client Initial Here**) **You hereby opt in to providing PPW with the information stated in the section above.**

Your Personal Data will only be used for the purposes stated above and will be treated in confidence. PPW will not disclose details about clients to any third parties outside the provisions of this policy unless written consent is obtained from clients. You may opt out of providing the Personal Data outlined in this section at any time as outlined in this Privacy Policy or upon written request.

4. How We Protect Your Personal Data

PPW's Written Supervisory Procedures include a cyber security policy which outlines our policies on data storage and protection. This is available upon request.

5. Disclosure of Personal Information to Third Parties

- I. **Third-Party Service Providers.** We may share your Personal Data with our third-party service providers. PPW will perform due diligence on these service providers to ensure, to the best of PPW's ability, that your Personal Data is secured at the highest possible privacy settings and used as described in this policy. We may also disclose your Personal Data to professional advisers, such as law firms and tax advisers, for purposes of providing their services to you.
- II. **Required by law or regulation.** We may share your Personal Data to comply with any legal obligation or duties. These may include but are not limited to, complying with tax reporting requirements, disclosures to regulators, and to exercise our own legal rights if an authority has reasonably requested such information.
- III. **Sale of business.** In the event PPW sells some or all of its business assets, we may need to disclose Client Personal Data to the prospective buyer for due diligence purposes.

6. International Transfers of Personal Data

PPW transfers Client Personal Data on a global basis. PPW will ensure that, when PPW transfers Client Personal Data outside the EEA, it is protected and transferred in a manner consistent with legal requirements. We may transfer data to outside of the EEA in one of the following ways:

- a) The country that we send the data to might be approved by the European Commission as offering an adequate level of protection for Client Personal Data;
- b) The recipient of Client's Personal Data might have signed a contract based on "model contractual clauses" approved by the European Commission, obliging them to protect the Client's Personal Data;
- c) Where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme; or
- d) In other circumstances the law may permit us to otherwise transfer Client Personal Data outside Europe.

7. How Long We Keep Your Personal Data

Unless otherwise instructed by you under the provisions of this policy, PPW may keep Personal Data for as long as it is necessary for the purpose for which we are using it. PPW may also need to keep your Personal Data for a minimum period if required by law or regulation.

8. Questions and Concerns

Questions or concerns about this Privacy Policy may be directed to Craig Colbath at Pasadena Private Wealth, LLC, 2 North Lake Avenue, Suite 250, Pasadena, CA 91101; (626) 993-9310.

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: Pasadena Private Wealth, LLC, 2 North Lake Avenue, Suite 250, Pasadena, CA 91101; (626) 993-9310.