



## CALIFORNIA PRIVACY POLICY

As a California resident, you have additional rights over the personal information that we collect about you that is not already protected by existing federal privacy laws. This California Privacy Policy describes the personal information that Benjamin F. Edwards & Co. (BFE) and Benjamin F. Edwards Wealth Management, LLC (EWM) (collectively, “we,” “us” and “our”) collect about you, the rights you have with respect to that information, and how you can exercise those rights. This information supplements the information contained in our Privacy Notice.

### Information we have collected about you in the last 12 months.

Depending on your relationship with us and your activities with us, we collect personal information about you. In some instances, we need to share certain personal information with others to carry out our business purposes. The following table identifies the categories of personal information we may have collected about you in the last 12 months and other important information.

Categories of PI collected in the past 12 Months	Categories of sources from which we collect PI	Business or commercial purpose for collecting the PI	Categories of PI disclosed for a business purpose	Categories of third parties To whom we disclose PI
Identifiers, such as your name, address, Internet Protocol (IP) address, unique personal identifier (device identifier), e-mail address, account name, social security number, driver's license number, passport number, telephone number(s) and signature.	<ul style="list-style-type: none"> <li>You, your financial advisor and third parties.</li> </ul>	<ul style="list-style-type: none"> <li>To maintain and service your accounts and to provide financial products and services to you.</li> <li>To comply with legal requirements.</li> <li>To respond to your requests, manage relationships.</li> <li>To market financial products and services to you.</li> <li>To detect fraud and security incidents and analyze activity on our websites.</li> </ul>	All.	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM).</li> <li>Service providers with whom we have contracts to maintain and service your accounts; market our products and services; manage our client relationships; analyze activity on our website; maintain the security, confidentiality and integrity of our systems and detect fraud.</li> <li>Financial institutions with whom we have joint marketing agreements (unless you have instructed us not to share your information for this purpose).</li> </ul>

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				<ul style="list-style-type: none"> <li>We have entered into an agreement with a number of other firms that permits your financial advisor to take certain limited information - your name, address, telephone number, e-mail address and account title - to contact you to service your accounts if they join another firm that is a party to the same agreement.</li> </ul>
Additional personal information such as age, citizenship, marital status, medical condition, physical or mental disability, gender.	<ul style="list-style-type: none"> <li>You, your financial advisor and third parties.</li> </ul>	<ul style="list-style-type: none"> <li>To maintain and service your accounts and to provide financial products and services to you.</li> <li>To respond to your requests, manage relationships.</li> <li>To market financial products and services to you.</li> <li>To comply with legal requirements.</li> </ul>	All.	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM).</li> <li>Service providers.</li> <li>Financial institutions with whom we have joint marketing agreements (unless you have instructed us not to share your information for this purpose).</li> </ul>
Commercial information, such as records of personal property, products or services purchased or considered.	<ul style="list-style-type: none"> <li>You, your financial advisor and third parties.</li> </ul>	<ul style="list-style-type: none"> <li>To maintain and service your accounts and provide financial products and services to you.</li> <li>To respond to your requests and provide service.</li> <li>To market financial products and services to you.</li> </ul>	All.	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM).</li> <li>Service providers.</li> <li>Financial institutions with whom we have joint marketing agreements (unless you have instructed us not to share your information for this purpose).</li> </ul>
Internet or other electronic network activity, such as your interaction with our website and, if applicable, your interactions with your account(s).	<ul style="list-style-type: none"> <li>You, your financial advisor and third parties.</li> </ul>	<ul style="list-style-type: none"> <li>To provide financial products and services to you.</li> <li>To maintain and service your account(s).</li> <li>To respond to your requests and provide service</li> <li>To detect fraud and security incidents, analyze</li> </ul>	All.	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM).</li> <li>Service providers.</li> <li>Third-party analytics providers.</li> </ul>

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		activity on our website and to improve our website. <ul style="list-style-type: none"> <li>To market financial products and services to you.</li> </ul>		
Audio, electronic and visual information, such as voice recordings when you call us on a recorded line, or your photograph if you visit a location with security cameras.	<ul style="list-style-type: none"> <li>You, your financial advisor and third parties.</li> </ul>	<ul style="list-style-type: none"> <li>To provide financial products and services to you.</li> <li>To provide customer service and maintain accounts.</li> <li>To detect fraud and security incidents, and to prosecute those responsible.</li> <li>To maintain the security of our premises.</li> </ul>	All.	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM);</li> <li>Service providers.</li> </ul>
Professional or employment-related data, such as your work history and income.	<ul style="list-style-type: none"> <li>You, your financial advisor and third parties.</li> </ul>	<ul style="list-style-type: none"> <li>To provide financial products and services to you.</li> <li>To maintain and service your account(s).</li> <li>To market financial products and services to you.</li> </ul>	All.	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM);</li> <li>Service providers.</li> <li>Financial institutions with whom we have joint marketing agreements (unless you have instructed us not to share your information for this purpose).</li> </ul>
Education information, such as institutions attended, degree(s) obtained and year(s) of graduation.	<ul style="list-style-type: none"> <li>You, your financial advisor and third parties.</li> </ul>	<ul style="list-style-type: none"> <li>To provide financial products and services to you.</li> <li>To market financial products and services to you.</li> </ul>	All.	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM);</li> <li>Service providers.</li> <li>Financial institutions with whom we have joint marketing agreements (unless you have instructed us not to share your information for this purpose).</li> </ul>
Inferences drawn from any of the information that we collect about you to create a profile about you and your preferences.	<ul style="list-style-type: none"> <li>You, your financial advisor and third parties.</li> </ul>	<ul style="list-style-type: none"> <li>To provide financial products and services to you.</li> <li>To maintain and service your account(s).</li> <li>To market financial products and services to you.</li> </ul>	All.	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM);</li> <li>Service providers.</li> <li>Financial institutions with whom we have joint marketing agreements (unless you have instructed us not to share your information for this purpose)..</li> </ul>

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### Consumers under the age of 16

We do not have actual knowledge that we sell or share personal information of minors under 16 years of age.

### Sensitive Personal Information

We do not use or disclose sensitive personal information for purposes other than permitted by law.

### Your rights.

- You have the right to know the categories and/or specific pieces of your personal information that we have collected, used, and disclosed in the preceding 12 months, the categories of sources from which we have collected personal information, the business or commercial purpose(s) for which we have collected, sold, or shared your personal information, and the categories of third parties to whom we have disclosed your personal information.
- You have the right to opt out of having your personal information sold or shared.
- You have the right to ask us to delete personal information that we collect from you.
- You have the right to not to be denied goods or services or charged different prices just because you have exercised your privacy rights.

### How to submit a request to know, delete, or correct personal information.

To submit a request to know, delete, or correct your personal information, you may call us at (855) 382-1600 or e-mail us at [privacy@benjaminfedwards.com](mailto:privacy@benjaminfedwards.com). Please do not send us your account number via e-mail.

We will aim to respond to your request within 45 days. If we require more time to respond (up to a total of 90 days), we will inform you of the reason and extension period in writing. If we deny your request, we will explain the reason(s) for our denial.

**We will verify your identity.** If you submit a request to know, delete, or correct your personal information, we will verify your identity. We will match pieces of personal information provided by you with personal information maintained by us that we have determined are reliable. We may also require that you submit a signed declaration under penalty of perjury stating that you are the individual whose personal information is the subject of the request.

In some instances, there is no reasonable method by which we can verify your identity. This is the case, for example, when you visit our website. In that circumstance, we collect your Internet Protocol address and information about your activity on our website, but we do not associate this information with any named actual person or account.

**You may designate an authorized agent to submit a request on your behalf.** You have the right to authorize an agent to submit a request to know, delete, or correct personal information on your behalf. To have an authorized agent submit a request on your behalf, call us at (855) 382-1600 or e-mail us at [privacy@benjamedwards.com](mailto:privacy@benjamedwards.com) and tell us that you would like to authorize an agent to submit a request to know, delete, or correct on your behalf.

You will need to provide us with written permission authorizing the agent to submit a request to know, delete, or correct on your behalf. We will still verify your identity and will verify that you have given your authority to the agent.

### **Contact for more information.**

If you have questions or concerns about our privacy policies and practices, you may contact us by calling us at (855) 382-1600 or by e-mail at [privacy@benjaminfedwards.com](mailto:privacy@benjaminfedwards.com). Please do not send us your account number via e-mail.