



MSH CAPITAL ADVISORS LLC

## Privacy Policy

| Facts                                                                                                                                                                                    | WHAT DOES MSH CAPITAL ADVISORS LLC (MSHCA) DO WITH YOUR PERSONAL INFORMATION?                                                                                                                                                                                                                                                                                                                                                                                       |                            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
|                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                            |
| Why?                                                                                                                                                                                     | Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.                                                                                                                                                    |                            |
|                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                            |
| What?                                                                                                                                                                                    | <p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"><li>• Social Security Number, Date of Birth, Income</li><li>• Risk Tolerance, Time Horizon, Investment Objectives</li><li>• Account Balance, Account Number, Assets, and Transactions</li></ul>                                                                                    |                            |
|                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                            |
| How?                                                                                                                                                                                     | All financial companies need to share customer’s personal information to run their everyday business. In the section below, we list the reasons we can share your personal information, the reasons we share, and whether you can limit this sharing.                                                                                                                                                                                                               |                            |
|                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                            |
| Reasons we can share your personal information:                                                                                                                                          | Does MSHCA share?                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Can you limit the sharing? |
| For our everyday business purposes - to open or service your account(s), including processing your transactions, and to respond to court orders and legal and regulatory investigations. | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | No                         |
| For our marketing purposes - to offer our products and services to you.                                                                                                                  | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | We don’t share             |
| For joint marketing - with other financial companies.                                                                                                                                    | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | We don’t share             |
| For text messaging purposes – client initiated text messages only.                                                                                                                       | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | We don’t share             |
| For our affiliates’ everyday business purposes - information about your transactions and experiences.                                                                                    | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | No                         |
| For our affiliates’ everyday business purposes - information about you and your creditworthiness.                                                                                        | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | We don’t share             |
| For our affiliates, M.S. Howells & Co. and MS Insentra LLC - to market to you.                                                                                                           | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | We don’t share             |
| For non-affiliates to market to you - only if your Advisor leaves MSHCA, retires or sells his or her practice.                                                                           | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Yes                        |
|                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                            |
| Questions to limit our sharing:                                                                                                                                                          | <p>For questions or to limit sharing, please call 480-563-2021 or visit <a href="http://www.mshcapitaladvisors.com">www.mshcapitaladvisors.com</a>.</p> <p>Please Note: If you are a new customer, we can begin sharing your information five (5) days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p> |                            |

**Who we are:****Who is providing this notice?**

This notice is being provided on behalf of MSH Capital Advisors LLC (a Registered Investment Adviser ) and its affiliates: M.S. Howells & Co. (an affiliated registered Broker-Dealer and member of FINRA & SIPC) and MS Insentra LLC (an affiliated Insurance Marketing Organization).

**SMS Privacy Policy**

**MSHCA values your privacy. By subscribing to our SMS notification service, you agree to this privacy policy.**

|                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Data Collection</b>    | We collect your phone number and name for SMS mobile messaging through the execution of the Discretionary Agreement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Data Usage</b>         | Your data is used solely for sending SMS messages This includes SMS messages for appointment scheduling or appointment reminders.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Data Security</b>      | <p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <p>We take reasonable steps to ensure the confidentiality of client information shared via text messages. However, clients are reminded to avoid including sensitive personal or financial information, such as account numbers or Social Security numbers, in text messages.</p> <p>We do not share any individual's consent to receive SMS from MSHCA with third parties. We do not share phone numbers for SMS purposes or affiliate marketing.</p> |
| <b>Data Retention</b>     | We retain your contact data for the duration of your enrollment. You may request deletion at any time. We honor deletion requests to the extent permitted by law and will retain information only as necessary to meet legal recordkeeping obligations                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Opt Out</b>            | Reply STOP to any message to unsubscribe.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Non-Sharing Clause</b> | We do not share your information with third parties for marketing purposes. Your information is only shared with our SMS provider for secure messaging.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

**What we do:**

|                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>How does MSHCA protect my personal information?</b> | To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. Our security practices include limiting access to this information to those employees and business associates with appropriate authority and for intended business purposes only.                     |
| <b>How does MSHCA collect my personal information?</b> | <p>MSHCA collects your personal information, for example, when you:</p> <ul style="list-style-type: none"> <li>• Open an account</li> <li>• Provide account information</li> <li>• Make contributions or withdrawals from your account</li> <li>• Seek financial advice</li> </ul> <p>We also collect your personal information from third parties, such as credit bureaus, affiliates, or other companies.</p> |

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|-------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Why can't I limit all sharing?</b>                                                     | <p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> <li>• Sharing for affiliates' everyday business purposes - information about your creditworthiness</li> <li>• Affiliates from using your information to market to you</li> </ul> <p>Sharing for non-affiliates to market to you</p> <ul style="list-style-type: none"> <li>• State laws and individual companies may give you additional rights to limit sharing.</li> </ul> |
| <b>What happens when I limit sharing for an account I hold jointly with someone else?</b> | Your choices will apply to everyone on your account.                                                                                                                                                                                                                                                                                                                                                                                                                  |

## Definitions:

|                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Affiliates</b>         | <p>Companies related by common ownership or control. They can be financial or non-financial companies. Our affiliates include M.S. Howells &amp; Co. and MS Insentra LLC.</p> <ul style="list-style-type: none"> <li>• No mobile information including Personally Identifiable Information (PII) or SMS consent will be shared with third parties/affiliates for marketing/promotional purposes.</li> </ul>                                                                                                                                                                                                                                                                                                                                                        |
| <b>Non-Affiliates</b>     | <p>Companies not related by common ownership or control. They can be financial and non-financial companies. Non-affiliates that we share with can include your financial Advisor's current and future investment advisory company, clearing firms, custodian firms, and other broker/dealers and investment advisers as designated by your investment advisor should he/she leave MSHCA or retire.</p> <ul style="list-style-type: none"> <li>• No mobile information including Personally Identifiable Information (PII) or SMS consent will be shared with third parties/non-affiliates for marketing/promotional purposes.</li> </ul>                                                                                                                           |
| <b>Third-Party Access</b> | <p>Non-affiliated companies are third-party entities that are not under common ownership or control with MSHCA and do not share a corporate relationship. In the context of SMS communications, these companies may include SMS gateway providers, mobile carriers, third-party messaging platforms, and vendors that support multi-factor authentication (MFA). While these entities may transmit, process, or store SMS messages on behalf of the adviser, they operate independently and are not affiliated with the RIA.</p> <ul style="list-style-type: none"> <li>• No mobile information including Personally Identifiable Information (PII) or SMS consent will be shared with third parties/non-affiliates for marketing/promotional purposes.</li> </ul> |
| <b>Joint Marketing</b>    | <p>A formal agreement between non-affiliated financial companies that together market financial products or services to you. MSHCA does not have any joint marketing agreements.</p> <ul style="list-style-type: none"> <li>• No mobile information including Personally Identifiable Information (PII) or SMS consent will be shared for joint marketing/promotional purposes.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                         |

## Other important information:

**COMPLAINTS:** Any complaints may be addressed to the attention of the MSHCA Compliance Department: 23350 N. Pima Rd., Scottsdale, AZ 85255, or call (480) 563-2021, or fax (480) 563-2001.

This notice applies to individual consumers who are customers or former customers. This notice replaces all previous notices of our Privacy Policy and may be amended at any time. We will notify you of changes or amendments as required by law.

## SMS Communications Disclosure

You may text your advisor if you prefer. We do not initiate texts and do not operate any SMS program, reminders, or marketing. Texting is not secure, so please do not include sensitive information or trading or wire instructions. We may move a conversation to email, your client portal, or another approved channel. If you text us, we use your number only to reply and do not share it for marketing. Business texts are retained and supervised as required by law; if a text cannot be captured, we will continue the conversation through an approved channel. If you prefer we not text, tell us and we will stop.