Ritholtz Wealth Management Notice for California Residents

We take protecting your data and privacy very seriously. As of January 1, 2020 the California Consumer Privacy Act (CCPA) suggests the following link as an extra measure to safeguard your data: https://www.caprivacy.org/

Individuals Located in (as Residents) California

California Consumer Rights

The California Consumer Privacy Act of 2018 ("CCPA"), including, the California Privacy Rights Act ("CPRA"), empowers California residents with the following rights:

- **A. Right to Know:** Consumers have the right to know what personal information our firm collected about the consumer, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom our firm discloses personal information, and the specific pieces of personal information our firm has collected about the consumer. Our firm's use of personal information is found within our Privacy Policy.
- **B. Right to Opt-Out:** Consumers have the right to direct businesses to stop the sale or sharing of their personal information to third parties. Our firm does not engage in the sale or sharing of personal information it holds.
- **C. Right to Limit the Use and Disclosure of Sensitive Information:** Consumers have the right to request that our firm limit the use and disclosure of sensitive personal information. However, our firm only uses and discloses sensitive personal information for purposes which are necessary for providing products or services to consumers.
- **D. Right to Correct:** The right to request that our firm rectify your personal data if it is inaccurate, outdated, or incomplete.
- **E. Right to Request Deletion:** Consumers have the right to request deletion of personal information, but only where that information was collected from the consumer. There are exceptions to what our firm is obligated to delete including, but not limited to, detecting security incidents, exercising free speech, for legal claims, or for internal uses reasonably aligned with consumer expectations.
- **F. Right to Equal Services and Prices:** Our firm is prohibited from discriminating against consumers by denying goods or services, charging different prices for identical services, or providing a lower quality of goods or services.

Exercising your California Consumer Rights

To exercise any of your rights set forth in this Notice, please submit a request by sending an email to Compliance@ritholtzwealth.com or calling us at (212) 625-1200.

California Notice of Collection

This Notice of Collection for California Residents supplements the information contained in our <u>Privacy Policy</u> and applies solely to residents of the State of California ("California Notice"). We have adopted this California Notice in order to comply with the CCPA as amended and expanded by the CPRA.

This California Notice is intended to fulfill CCPA's objectives of providing California consumers with a comprehensive disclosure of the collection, sharing, disclosure, and sale of their personal information by particular businesses (as CCPA defines those terms), and of the rights that California consumers have regarding their personal information ("California Privacy Rights").

This California Notice specifically sets forth how we handle personal information we collect via our firm's website and any other application where this Notice is posted ("Site") (a) when individuals engage with us or use our products or services; (b) in connection with providing services to our clients; (c) as part of a current or former employment relationship; (d) from applicants for employment opportunities with us; (e) through use of our website; or (f) through any other interaction with a Site.

Ritholtz Wealth Management collects and processes the following types of Personal Information, as described in the table below. Ritholtz Wealth Management does not sell or share your personal information.

Category of Information	Examples	Collected	Purpose	Disclosed*
Identifiers	A real name, alias, postal address, unique personal identifier, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes	Employee/A pplicant Records Provision of Services	Yes
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Yes	Employee/A pplicant Records Provision of Services	Yes
Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status,	Yes	Employee/A pplicant Records	Yes

Category of Information	Examples	Collected	Purpose	Disclosed*
	medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).			
Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes	Provision of Services	Yes
Biometric information.	Voiceprints if a voicemail message is recorded.	No	N/A	No
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes	Lawful Basis	Yes
Geolocation data.	Physical location or movements.	No	N/A	No
Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No	N/A	No
Professional or employment-related information.	Current or past job history	Yes	Employee/A pplicant Records Provision of Services	Yes

Category of Information	Examples	Collected	Purpose	Disclosed*
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No	N/A	No

^{*} For a legitimate interest or business purpose. Our firm does not sell or share your personal information.

We also collect, or may collect, sensitive personal information such as the following personal information that consists of:

- A. Government Identifiers, such as Social Security Numbers and driver's license numbers;
- B. Account log-in information (e.g., financial account or credit card numbers, potentially in combination with any required access codes or passwords);
- C. Racial or ethnic origin, religious or philosophical beliefs, or union membership; and
- D. Contents of postal mail, email, and/or text messages.

We do not use or disclose personal information for purposes other than those disclosed in our firm's <u>Privacy Policy</u>.