# STUDIOi, LLC Privacy Policy

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Investment advisers are required by law to provide clients with information regarding their privacy practices. We believe the trust our clients place in us extends beyond regulatory compliance. Protecting confidential information is a professional responsibility fundamental to every relationship we serve. Federal law grants clients the right to limit some but not all sharing of personal information. It also mandates that we disclose how we collect, share, and protect your personal information.

## Types of Nonpublic Personal Information (NPI) We Collect

We collect and maintain nonpublic personal information about current clients, former clients, and prospective clients in connection with evaluating, establishing, or providing investment advisory, financial planning, financial coaching, and other related professional services.

Such information may be provided directly by you, obtained with your authorization, received from third parties acting on your behalf, or otherwise lawfully obtained.

### Identity Information

- Name
- Taxpayer Identification Number (TIN), including Social Security Numbers (SSNs) and Employer Identification Numbers (EINs), where applicable
- Date of Birth
- Government-issued identification, where required

### Financial Information

- Financial account numbers and balances
- Banking and payment information, including account numbers, routing information, ACH and wire instructions, payment authorization information, and other information reasonably necessary to facilitate authorized transactions, account funding, distributions, or the payment of advisory fees
- Sources of income
- Credit card or other payment information
- Investment holdings, retirement accounts, insurance policies, and other financial assets

### Legal, Estate, and Business Information

Tax records, estate planning documents (such as wills, trusts, and powers of attorney), business organizational documents, and other records reasonably necessary to evaluate, establish, or provide our professional services.

### Other Information

- Information regarding your financial goals, objectives, risk tolerance, and personal circumstances
- Other information reasonably necessary to evaluate, establish, or provide our professional services

If you are no longer our client, we may continue to retain and protect your nonpublic personal information and may share it only as permitted or required by law and as described in this Privacy Policy.

## How We Use and Share Your Information

STUDIOi does not sell your personal information. We share nonpublic personal information only as reasonably necessary to evaluate, establish, or provide our professional services, comply with legal and regulatory obligations, or as otherwise permitted or required by law.

In the ordinary course of business, we may share your information with:

- Qualified custodians that maintain your investment accounts.
- Non-affiliated service providers, such as technology providers, financial planning software providers, communications providers, payment processors, and other vendors that assist us in delivering our professional services.
- Attorneys, accountants, trustees, or other professionals when authorized by you or otherwise permitted or required by law.
- Federal or state regulators, law enforcement agencies, courts, or other governmental authorities when required by applicable law.

STUDIOi seeks to engage service providers that maintain appropriate safeguards for the protection of confidential information and, where appropriate, are subject to contractual confidentiality and data protection obligations.

### Privacy Rights Under Federal Law

Federal privacy laws require investment advisers to disclose the categories of information sharing that may occur and whether clients have the right to limit certain types of sharing.

STUDIOi may share information:

- **For Everyday Business Purposes** – Such as processing transactions, maintaining accounts, responding to court orders or legal investigations, and complying with regulatory requirements.
- **For Our Marketing** – To provide you with information regarding STUDIOi's own products, services, educational content, or events.
- **For Joint Marketing** – Where permitted by law, in connection with joint marketing arrangements with other financial institutions or service providers.
- **For Affiliates' Everyday Business Purposes** – STUDIOi does not currently share client information with affiliated companies for these purposes.
- **For Non-Affiliates' Marketing Purposes** – STUDIOi does not sell your personal information to non-affiliated companies for their independent marketing purposes.

If our information-sharing practices change in a manner that provides you with additional rights under applicable law, we will update this Privacy Policy and provide any required notices.

If you are no longer our client, we may continue to retain and share your information only as permitted or required by law and as described in this Privacy Policy.

## Protecting Your Confidential Information

To protect your personal information from unauthorized access and use, we implement security measures that comply with federal law. These measures include:

- Secure physical storage and restricted file access.
- Encryption of electronic records.
- Computer safeguards, including firewalls and two-factor authentication.
- Internal policies limiting access to client data strictly to authorized personnel.

STUDIOi is committed to protecting your personal information through administrative, technical, and physical safeguards designed to reduce the risk of unauthorized access, use, or disclosure. However, no security program or method of transmitting or storing information can eliminate all risk. We seek to work with service providers that we reasonably believe maintain appropriate privacy and security safeguards; however, independent third parties maintain their own information security programs and privacy policies.

## Your Right to Limit Sharing (Opt-Out)

Where applicable under federal law, you may have the right to limit certain types of information sharing, including:

- Sharing for affiliates' everyday business purposes related to your creditworthiness.
- Sharing with affiliates and non-affiliates for marketing purposes.

To opt out of these types of sharing, please email us at concierge@wearestudioi.com or call 480.900.6118.

State laws and individual company policies may grant additional rights regarding data privacy.

## Use of Artificial Intelligence (AI) in Operations

STUDIOi may use artificial intelligence ("AI")-enabled technologies to support certain administrative, operational, research, and communication functions within the firm. AI is used as a productivity tool to assist our professionals and is not a substitute for professional judgment.

Examples of how AI may be used include:

- Drafting and editing correspondence and documents.
- Summarizing meetings or notes.
- Conducting research and organizing information.
- Supporting internal administrative and operational workflows.
- Assisting with marketing and educational content.

AI tools may process information reasonably necessary to perform these functions. Where client information is involved, STUDIOi seeks to use commercially reasonable safeguards, limits the information shared to what is reasonably necessary, and utilizes providers that offer appropriate privacy and security protections where available.

STUDIOi does not rely on AI alone to provide investment advice, make discretionary investment decisions, or replace the professional judgment of its advisory personnel. Recommendations provided to clients remain subject to review and approval by qualified personnel.

## Data Security & Breach Notification

STUDIOi takes the protection of your personal information seriously. In the unlikely event of unauthorized access to or use of your personal information, we have policies and procedures in place to identify, contain, and mitigate any potential breach.

If a breach involving your personal information occurs and notification is required by applicable law, STUDIOi will provide notice in accordance with those legal requirements.

## Third-Party Service Providers

STUDIOi works with custodians, technology providers, financial planning software providers, communications providers, and other trusted service providers to assist in delivering our services.

## Annual Privacy Notice

STUDIOi provides clients with our Privacy Policy at the time of engagement and, when required, on an annual basis. If there are no changes to our privacy practices and we do not share personal information in a manner that requires an opt-out, we may rely on the SEC's exemption from the annual notice requirement.

## Definitions

- Affiliates – Companies related through common ownership or control. STUDIOi may share information with affiliated companies only as permitted by law and as described in this notice.
- Non-Affiliates – Companies not related by common ownership or control. They can be financial and non-financial companies.
- Joint Marketing – A formal agreement between non-affiliated financial companies that together market financial products or services to clients.

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## Mobile Information & SMS Privacy

STUDIOi respects your privacy and is committed to protecting any information you provide when opting into SMS communications.

- **Confidentiality of SMS Data**: All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.
- **No Mobile Data Sharing for Marketing**: No mobile information will be shared with third parties/affiliates for marketing/promotional purposes.
- **How We Use SMS Communications**: If you have opted into SMS communications, we may send messages in connection with our professional services, including appointment reminders, service updates, document requests, educational communications, and similar client communications. **STUDIOi will never request your passwords, account login credentials, or one-time authentication codes via SMS**. Message frequency varies depending on your relationship with STUDIOi and the services you receive. If additional documentation is needed, we may request that it be provided through an appropriate secure communication method. We will not provide investment recommendations or account balance information through SMS.
- **Opting Out of SMS**: You may opt out of SMS messages at any time by replying "STOP" to any message received. Standard message and data rates may apply.

## Questions?

If you have any questions regarding this Privacy Policy or wish to opt out of certain information sharing, please contact us at:

**STUDIOi, LLC**
PO BOX 33413
Phoenix, Arizona 85067

concierge@wearestudioi.com
480.900.6118

Protecting your privacy is fundamental to the trust you place in us. We are committed to safeguarding your information and maintaining the professional standards expected of a fiduciary investment adviser.