



## Privacy Policy

At Quincy Wells Capital, LLC and Quincy Wells Advisors, LLC (collectively “QWC/QWA”), protecting your privacy is very important to us. We value your trust and want you to understand what information we collect, how we use it, and how we protect it. The Gramm-Leach-Bliley Act, passed in 1999, requires that all companies distributing financial and insurance products to the public develop and publish a privacy policy. QWC/QWA’s Privacy Policy provides information relating to how and when we share customer information with unaffiliated third parties. A copy of our privacy policy is delivered to clients at the time of account opening; - either hand-delivered, electronically delivered or by mail, and annually thereafter.

### Personal Information We May Collect

During our relationship, QWC/QWA may obtain nonpublic personal information from you. The information we obtain assists the firm and our Financial Advisors in providing you with products and services, and also to satisfy regulatory requirements. This information may be obtained from various sources including:

- Account applications and other forms,
- Your transactions with us or others,
- From written, electronic and verbal correspondence and communication, and/or
- From a consumer reporting agency.

### The Balance of Respecting Your Privacy & Sharing Information with Third Parties

As a matter of policy, QWC/QWA do not disclose personal or account information provided by clients to non-affiliated third parties, except as follows:

- When required or permitted by law, or as necessary for third parties to perform their agreements with respect to services performed on our behalf.
- To administer, manage, service, and provide related services for client accounts, it is necessary for QWC/QWA to provide access to client information within the firm and to non-affiliated companies, with whom we have entered into agreements. The disclosure of information contained in any document completed by the client for processing and/or transmittal by QWC/QWA to facilitate the commencement, continuation, and/or termination of a business relationship between the client and/or QWC/QWA and a non-affiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, recordkeeper, insurance company, etc.), including, but not limited to, information contained in any document completed and/or executed by the client in furtherance of the client's engagement of QWC/QWA (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding non-affiliated third-party service provider.

QWC/QWA reserves the right to:

- In limited circumstances, disclose or report personal information to non-affiliated third parties when the firm believes in good faith that disclosure is required under law, and to cooperate with regulators or law enforcement authorities as may be requested.
- Disclose information about client accounts to a non-affiliated third party at the client’s request, or with the consent of the client.
- Disclose personal information that is necessary in providing administrative, custodial, or customer assistance, and in preparing, printing and delivering statements and other client related documents. These companies include clearing firms, mutual fund, annuity and other financial services companies that aid in fulfilling these services to our clients.
- QWC/QWA do not provide information about our clients or former clients to any non-affiliated third party for marketing purposes.



## Opt Out Provision

If your Financial Advisor leaves Quincy Wells Capital, LLC, the broker-dealer, to join another broker-dealer that is a member of the Protocol for Broker Recruiting (to which our firm is a signatory), we may permit your advisor to retain certain contact information that may be used by his/her new firm; limited to your name, address, email address, phone number, account title and account type. If you object to such information being retained by your Financial Advisor or shared with his/her new firm, you may opt out by contacting our Compliance Department at 312-517-2606 or emailing [general@quincywells.com](mailto:general@quincywells.com).

## Procedures to Safeguard Private Information

QWC/QWA maintain procedures and technology designed to prevent unauthorized access to private personal information. We restrict access to personal information to employees and service providers who need to know that information to provide products or services to you. Employees who violate our Privacy Policy are subject to company and regulatory disciplinary action.

When accessing your account via a link from your advisor/registered representative using a browser, it is encrypted using Secure Socket Layer (SSL) 128-bit encrypted security. This technology is used to protect the confidentiality of your personal information.

## State Specific Regulations

Pursuant to California Consumer Privacy Act ("CCPA"), California residents, as defined in Section 17014 of Title 18 of the California Code of Regulations, have certain rights regarding their personal data. These rights include the Right to be Notified of the personal information that QWC/QWA has collected about you over the last 12 months; the Right to Request the personal information that QWC/QWA has collected about you; the Right to Delete, with exceptions, the personal information that QWC/QWA has collected about you; and the Right to not be discriminated against for exercising any of the above rights.

To request the personal information that has been collected about you or to request deletion, please call 312-517-2606

In response to the CCPA, to be conservative we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by Federal and California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.

## Change in Privacy Policy

QWC/QWA reserve the right to modify or supplement this Privacy Policy at any time. If a material change is made, we will provide current clients with a revised notice that describes our new policy and if such practices so require, we will give them a reasonable opportunity to opt out of the disclosure of information under the revised Privacy Policy.