



Privacy Policy

INTRODUCTION

Allworth Financial dba RAA and its affiliated entity Allworth Tax Solutions (hereinafter collectively referred to as “RAA” or “we”) appreciate your trust and respect your privacy. This Privacy Policy describes the information that we collect, why we collect and how we use, share and protect information we collect from or about visitors to our websites (all together, “Site”) and from users of our services.

IF YOU ARE OUR “CUSTOMER”: please see our Customer Notice of Privacy Practices at raa.com/privacypolicy. You are our **customer** if you are an individual who has a continuing relationship with RAA through an advisory or brokerage account.

IF YOU ARE A CALIFORNIA RESIDENT: please see our California Privacy Notice (below) which supplements this Privacy Policy and may apply to you if you are a California resident who is not our customer or someone who has or will obtain a financial product or service from RAA for your personal use.

If a term of this Privacy Policy and/or the California Privacy Notice conflict with our Customer Notice of Privacy Practices, then the term of the Customer Notice of Privacy Practices applies.

INFORMATION WE COLLECT AND WHY WE COLLECT IT

The information RAA collects from or about you depends on how you use the Site and our services. The three main categories of personal information that we collect are:

1. Information that you provide to RAA

- We collect name, address, email address and telephone number when you sign up to receive our newsletters, updates and checklists, register to attend one of our workshops or other events, when you fill out a form to schedule a consultation for financial or tax advice, when you use our online tools and resources and when you create an account.
- When you submit a request for a consultation with one of our professionals, we collect information about your retirement savings and other information you choose to provide us. Information we collect may include but is not limited to: income; account balances; transaction history; assets; investment experience; account transactions; risk tolerance; medical-related debts; credit card or other debt; mortgage rates and payments; retirement assets; checking account information; employment information; and wire transfer instructions.
- When you use our tax preparation services, we collect the information that you give us to prepare your tax returns.
- When you apply for a job at <https://www.allworthfinancial.com/careers>, we collect your contact information, professional certifications information and other information you choose to provide in your resume or CV.

2. Information collected from third parties

From time to time, we may collect personal information about you from third-party sources, such as marketing services vendors that help us identify individuals who may be interested in learning more about our Site and services and to supplement personal information we already have about you, such as when we acquire a contact list from data aggregators and from publicly-available sources so that we can better understand who is interested in our Site and services.

3. Information automatically collected

We automatically collect certain information about use of the Site from the computer or mobile device you use to visit the Site. Some of this automatically collected information is personal information. The information that we automatically collect includes information about how your computer or device interacts with our Site, including the date, time, search requests and results, webpages accessed and links clicked; IP address, device type and identification number, browser type, internet service provider, operating system and other technical information. We use this automatically collected information to better understand how our Site is used so that we can improve it and develop new features, such as by measuring the number of unique visitors to the different sections of our Site, to understand how people find our Site and to help us make our Site and marketing more useful. We also use this information to detect and block fraudulent use of the Site and to deliver advertising. Some of this information is



automatically collected using cookies and other data tracking technology, as described below.

OUR USE OF COOKIES AND OTHER TRACKING TECHNOLOGY

We use cookies and other data tracking technology to collect and use personal information about you. We also allow others to use cookies and similar technologies (e.g., pixels) to recognize you and/or your device(s) when you use the Site and when you visit other websites before or after you visit the Site.

- **What are cookies?**

Cookies are small text files that are sent to or accessed from your web browser or your computer's hard drive. A cookie typically contains the name of the domain (internet location) from which the cookie originated, the "lifetime" of the cookie (i.e., when it expires) and a randomly generated unique number or similar identifier. A cookie also may contain information about your computer, such as settings, browsing history and activities conducted while using the Site.

Cookies that RAA sets on the Site are called first-party cookies. Cookies set by any other party are called third-party cookies. Third-party cookies enable third-party features or functionality on or through the Site, such as analytics, marketing automation and customer support. The parties that set third-party cookies can recognize your computer both when it visits the Site and also when it visits certain other websites.

- **Why does RAA use cookies and other tracking technology?**

Some cookies are required for the Site to operate. Other cookies enable us to track the interests of Site visitors for targeted advertising and to enhance the experience of the Site.

The types of cookies served on the Site and why they are used is as follows:

- "Strictly necessary" cookies are required to allow us to deliver the Site to you.
- "Performance" or "Analytics" cookies help us to collect information about how visitors and customers use the Site and helps us analyze and improve the Site.
- Performance or analytics cookies remain on your computer after you close your browser until you delete them.
- "Advertising" cookies are used to make advertising messages more relevant to you. They help to display advertisements that are based on your inferred interests, prevent the same ad from appearing too often and ensure that ads are properly displayed for advertisers.

Pixels and similar data collection technology enable RAA to monitor the traffic patterns on the Site, to deliver or communicate with cookies, to understand whether you visit the Site after seeing our online advertisement displayed on a third-party website, to improve performance of the Site and to measure the success of our email marketing campaigns.

We also use Google's Analytics on our Site, including Google Dynamic Remarketing and GA Audiences. Google Analytics provides us with demographic-type data about Users, such as age and gender. Google uses a cookie that Google recognizes when you visit other websites. Google's cookies help us analyze how the Site is used. The information generated by the cookie about use of the Site (including your IP address) is transmitted to and stored by Google on servers in the United States. On behalf of RAA, Google will use this information to evaluate use of the Site and compile reports for us and third parties that help operate and provide services related to RAA.

For more information about how Google collects, uses and shares your information, please visit <https://www.google.com/policies/privacy/partners/> or Google's Privacy Policy. Google has developed an opt-out browser add-on; if you want to opt out of Google Analytics, you can download and install the add-on for your web browser. You may refuse the use of these cookies by selecting the appropriate settings on your browser. To opt out, please click here: tools.google.com/dlpage/gaoptout.

RAA currently does not serve targeted advertisements on the Site. RAA may, however, use information about your visits to the Site to provide relevant advertisements on other websites. RAA and third parties also may deploy technology that measures the effectiveness of our advertisements by using cookies or web beacons and to provide relevant advertisements on other websites about goods and services that may interest you.

You have the right to decide whether to accept or reject cookies by setting your browser to refuse all cookies or to indicate



when a cookie is set. (Most browsers accept cookies automatically but allow you to disable them. Some features of the Site may not work properly without cookies. To learn more about cookies generally, visit www.allaboutcookies.org and <https://optout.aboutads.info/?c=2&lang=EN>.

Data from authenticated and unauthenticated sessions may be stitched together with other operational data, if you chose not to opt-out from cookies. To those ends, such data that identifies a particular device (like device mobile phone number if it cannot be reset) will not be permanently linked. If you would like to opt-out of cookie tracking or request to view or delete your data from our system, you may do so by adjusting your cookie preferences or submitting an official request using the following link: <https://allworthFinancial.com/remove-cookies>]

Some web browsers (including Safari, Microsoft Edge, Firefox and Chrome) incorporate a “Do Not Track” (“DNT”) or similar feature that signals to websites that a visitor does not want to have his or her online activity and behavior tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain information about the browser’s user. Not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many website operators, including RAA, do not respond to DNT signals.

HOW WE SHARE PERSONAL INFORMATION

RAA shares personal information with organizations that help us operate the Site and our services, when we are legally required to do so and otherwise as described in this Privacy Policy. We share personal information with the following categories of recipients:

- Professional advisors, such as lawyers, accountants and information security and forensics experts;
- Marketing vendors that help promote RAA and communication about our offerings and from time to time supplement personal information that we already have.
- Our vendors and suppliers to enable them to work for us. For example:
 - When necessary to complete a transaction in a customer account or provide other engaged services, such as with the clearing firm, account custodians or software vendors;
 - Providing account servicing and maintenance and customer service;
 - Auditing consumer interaction on our Site;
 - Detecting, protecting against, and prosecuting security incidents and fraudulent illegal activity;
 - Bug detection and error reporting;
 - Customizing content on the Site; and
 - Improving our existing services and website experience, including to perform data analytics and test, monitor, secure and enable the Site and RAA’s services.
- Competent law enforcement, government regulators, courts or other third parties when we believe disclosure is necessary (i) to comply with law, (ii) to exercise, establish or defend our legal rights, or (iii) to protect the vital interests of you or a third party;
- Potential or actual acquirers or investors and their professional advisers in connection with any proposed merger, acquisition or investment in or of all or any part of our business, including with or without notice. This includes consumer non-public personal information as set forth in §248.15 of Regulation S-P.
- Our affiliates; and
- Any other third party, with your permission.

Sharing Nonpublic Personal and Financial Information

RAA is committed to the protection and privacy of its customers’ and consumers’ personal and financial information. We will not share such information with any other affiliated companies or any nonaffiliated third party except:

- When required to maintain or service a customer account;
- To resolve customer disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the customer;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- In connection with a sale or merger of RAA or its affiliated entities;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- To comply with federal, state or local laws, rules and other applicable legal requirements;



- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- In any circumstances with the customer's instruction or consent; or Pursuant to any other exceptions enumerated in the California Financial Information Privacy Act.

HOW WE PROTECT YOUR INFORMATION

RAA uses technical, physical and administrative safeguards intended to protect the personal information that we collect from and about you. Our safeguards are designed to provide a level of security appropriate to the risk of processing your personal information and include (as applicable) measures to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and a procedure for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of personal information. We restrict access to information employees and other approved third parties working on our behalf who have a specific business purpose to access that information.

We may suspend your use of all or part of our Site without notice if we suspect or detect any breach of security. If you believe that information you provided to us is no longer secure, please notify us immediately at info@wiselylabs.io.

If we become aware of a breach that affects the security of your personal information, we will provide you with notice as required by applicable law. When permitted by applicable law, we will provide this notice to you through the email address you used to communicate with us.

We retain personal information for as long we have a legitimate business need to do so, such as to comply with applicable legal, tax or accounting requirements. When we no longer have a legitimate business need to process your personal information, we will either delete or anonymize your personal information. If we cannot delete or anonymize your personal information, then we will segregate and securely store your personal information until deletion or anonymization is possible. Once we anonymize your personal information, it is no longer personal information. We use anonymized data subject to applicable law.

If you have any questions regarding the safeguarding of your nonpublic personal and financial information, please contact our Compliance Department at 340 Palladio Parkway, Suite 501, Folsom, California, 95630.

Your Rights as a California Resident

Residents of the state of California have the right to request certain information from us with respect to the types of personal information we share with third parties for their direct marketing purposes, as well as the identities of the third parties we have shared such information with during the immediately preceding calendar year.

Your Rights as a Florida Resident

If you are a new customer, we can begin sharing your information 45 days from the date you received our privacy notice. When you are no longer our customer, we may continue to share your information as described in this policy. However, you can contact us at any time to limit our sharing and to restrict online marketing and direct mail.

LINKS TO THIRD-PARTY WEBSITES

The Site may contain links to other websites that offer services we think our customers may find useful or will improve our services. The links are provided for your convenience and are not controlled by RAA, nor is the content monitored by RAA. The third-party websites may require you to provide personal information to use their services. While we try to link to websites that share our high standards and respect for personal privacy, RAA is not responsible for the content or the privacy practices of any third party. Use of any linked third-party website that you access through the Site is at your own risk. Personal information collected on other websites is not covered by this Privacy Policy. Unless stated otherwise, the policies of those other websites govern the collection, use, disclosure and security of the personal information collected through them.

CALIFORNIA PRIVACY NOTICE

RAA's California Privacy Notice ("**California Privacy Notice**") applies to the processing of Personal Information of residents of the U.S. State of California who are **not** our "customers" (as defined in "Introduction" above) ("**California**



Consumers") as required by the California Consumer Privacy Act of 2018 ("**CCPA**").

If you are a California Consumer, this California Privacy Notice explains your privacy rights and is intended to inform you at or before the time that you provide us with your Personal Information how and why we process your Personal Information. In this California Privacy Notice, "**Personal Information**" means information that identifies, relates to, describes, is capable of being associated with or could reasonably be linked, directly or indirectly, with a particular California Consumer or household.

If this California Privacy Notice and any provision in the rest of our Privacy Policy conflict, then this California Privacy Notice controls for the processing of Personal Information of California Consumers.

Your California Consumer Privacy Rights

CCPA offers California Consumers the following key privacy rights:

- **Right to Access Information:** You have the right to request access to Personal Information collected about you and information regarding the source of that information, the purposes for which we collect it and the third parties and service providers with whom we share it.
- **Right to Request Deletion:** You have the right to request that we delete certain Personal Information that we have collected from you.
- **Right to Notice of Financial Incentive:** If we offer a financial incentive or price or service difference in exchange for your Personal Information, we will notify you in advance before collecting your Personal Information for this purpose and explain how you can opt-in to the financial incentive or price or service difference.
- **Right to Opt-Out of Sale of Personal Information to Third Parties:** RAA does not sell your Personal Information to third parties. If this policy changes, we will notify you and provide you with information about how to opt out of sale of your Personal Information by us. Sharing your Personal Information with our service providers is not a sale of your Personal Information because we make sure that our service providers are contractually obligated to use the Personal Information only to provide services to us and not sell it.

Our Notice at Collection of Personal Information

For CCPA purposes, RAA generally acts as a "Business" with respect to your Personal Information, which means that RAA determines how and why the Personal Information that RAA collects from or about you is processed. This Notice at Collection of Personal Information describes the categories of Personal Information we collect, the purposes for which we collect Personal Information and the sources from which we collect Personal Information. The following table lists categories of Personal Information that generally match the categories in the definition of Personal Information in CCPA. We indicate for each listed category the specific types of Personal Information in the category that we collect and why we collect it. We also provide information about how we use and disclose Personal Information above in this Privacy Policy.



Category of Personal Information listed in CCPA	Examples of Personal Information in CCPA Category that RAA Collects	Why RAA Collects this Personal Information
A. Identifiers	Name, postal address, email address, unique identifier, Internet Protocol address, account name, and similar identifiers. Social security number, driver's license number or passport number. Insurance policy number, education, employment history, medical information, or health insurance information.	<p>We collect your name, telephone number(s), email address(-es) and contact address when you create an account, an account is created for you or you complete a transaction. We collect your IP address and your Device ID automatically. We also collect this Personal Information</p> <ul style="list-style-type: none"> • To troubleshoot problems; • To learn how users interact with our website and services; • To improve our products and services and develop new features; • To customize your experience; • To promote our products and services; and • To communicate with you.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, signature, address, telephone number and current employer and work address.	<p>We collect your name, telephone number(s), email address(-es) and contact address when you create an account, an account is created for you or you complete a transaction. We collect your IP address and your Device ID automatically. We also collect this Personal Information</p> <ul style="list-style-type: none"> • To troubleshoot problems, • To learn how users interact with our website and services, • To improve our products and services and develop new features, • To customize your experience, • To promote our products and services, and • To communicate with you.
C. Protected classification characteristics under California or federal law	Information about legally-protected classifications, including race, national origin, citizenship, marital status, gender, sexual orientation/identity, medical condition, AIDS/HIV status, genetic information, military or veteran status, religion, disability, political affiliations or activities or status as a victim of domestic violence, assault or stalking.	We collect certain information about protected classification characteristics in order to facilitate the opening of your accounts as well as complete your financial plan.
D. Commercial information	Records products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	We create records of the services purchased or considered, as well as your purchasing history in order to provide you with the services that you have purchased and to offer other products that may be useful to you.
E. Biometric information	Information about your physiological, biological or behavioral characteristics.	[None]



F. Internet or other similar network activity	Browsing history, search history, information on a California Consumer's interaction with online services and digital advertisements.	We collect information about your browsing history, search history and information regarding your interaction with customer portals, websites, applications or advertisements automatically when you use our site and services.
G. Geolocation data	Physical location or movements from GPS, WiFi and/or Bluetooth (when a device's operating system settings allow collection).	We collect your IP address automatically. We may be able to determine your general location based on the IP address.
H. Audio, electronic, visual, thermal, olfactory or similar information.	Recorded telephone calls and photographs.	If you contact us via telephone, we may record the telephone call. We will notify you if a call is being recorded at the beginning of the telephone call. We do not collect any thermal, olfactory or similar information.
I. Professional or employment-related information	Depending on how and why you use the Site or Services, we may collect information about your current employer who or that is a customer or prospective customer and	We may use information about your position and your current employer (who or that is the customer or prospective customer) to understand more about you in order to provide you with relevant information to promote our products and services, to deliver advertising, some of which is targeted based on your online activity and inferred interests, and to communicate with you.
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. 1232g, 34 C.F.R. Part 99))	We do collect information about the institutions you have attended or the level of education you have attained.	We may use information about your education, institutions you have attended or the level of education you have attained in order to help build your client profile and financial plan.
K. Inferences drawn from other categories (A. – L above) to create a profile about a California Consumer	Profile reflecting your preferences and characteristics.	We may analyze your actual or likely preferences through the Personal Information we collect and process as described in our Privacy Policy.

HOW TO SUBMIT A REQUEST TO EXERCISE YOUR CALIFORNIA PRIVACY RIGHTS

To submit a request to exercise your privacy rights:

1. Send an email to: compliance@allworthfinancial.com
2. Call us at 888-927-0244

Please note:

- We may (and in some cases are required to) verify your identity before we can act on your request to exercise your privacy rights.
- We may not honor part or all your request – for example, certain information we collect may be exempt from this California Privacy Notice, such as information collected, processed, sold, or disclosed pursuant to the federal Gramm-Leach-Bliley Act (Public Law 106-102), and implementing regulations or the California Financial Information Privacy Act, public information made available by a government entity or information covered by another privacy law. Please also note that Personal Information collected in many types of B2B transactions is exempt from most of CCPA's requirements until January 1, 2023. We will explain why we do not honor your request when we respond to you.



15725 Dallas Parkway, Suite 220
Addison, TX 75001

A different California law permits California residents to request a notice disclosing the categories of Personal Information about you that we have shared with third parties for their direct marketing purposes during the preceding calendar year. At this time, RAA does not share Personal Information with third parties for their direct marketing purposes.

Other Opt-Out Provisions

To opt-out of receiving our direct mailers, you may send us an e-mail at clientreply@raa.com, call us at (800) 321-9123 or send a written request to 15725 Dallas Parkway, Suite 220, Addison, TX 75001. We will honor those requests, but please understand it may take several days for these mailings to end.

UPDATES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will post the updated version and change the Effective Date above. We also will take appropriate measures to inform you in advance so that you have an opportunity to review the revised Privacy Policy before it is effective. If your consent is required by applicable privacy laws, we will obtain your consent to changes before the revised Privacy Policy applies to you.

HOW TO CONTACT US

If you have questions about this Privacy Policy, please contact: compliance@allworthfinancial.com or 888-927-0244. For all other inquiries, please contact clientreply@raa.com or 800-321-9123.