



# California Consumer Privacy Notice

Your privacy is important to us and maintaining your trust is our priority. Abacus Wealth Partners, LLC (“Abacus,” “we,” “our,” or “us”), respects your privacy and is committed to protecting it through our compliance with this California Privacy Notice (“Notice”). We believe you have the right to know what information we collect, how we use it and what security measures we have taken and will continue to take to protect your information.

This California Privacy Notice supplements the information contained in the Privacy Policy Notice of Abacus and applies solely to visitors, users, and others who reside in the State of California (“Consumers” or “you”) and engage us for investment advisory services, financial planning and consulting (collectively, “Services”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA will have the same meaning when used in this Notice. Capitalized terms used but not otherwise defined herein or in the CCPA shall have the meanings given to such terms in our Customer Privacy Policy Notice.

## Personal Information We Collect

As used in this California Privacy Notice, “personal information” means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include: (i) publicly available information from government records; (ii) de-identified or aggregated consumer information; or (iii) personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA) and the Gramm-Leach-Bliley Act (GLBA).

We have collected the following categories of personal information from consumers within the preceding twelve (12) months:

- A.** Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.
  - Source—We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.
  - Business purpose for collection—We collect this data to market to clients and potential clients and service existing clients, including maintaining or servicing accounts, providing customer service, processing transactions, verifying customer information, preventing fraud, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.
  - Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf. We also share this information with affiliates and with governmental entities. We do not share this information with affiliates for marketing purposes.
- B.** Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) such as 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, debit card number, or any other financial information, medical information, or health insurance information.

- Source—We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.
- Business purpose for collection—We collect this data to market to clients and potential clients and service existing clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling transactions, verifying customer information, preventing fraud, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.
- Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf and with governmental entities. We do not share this information with affiliates for marketing purposes.

**C.** Protected classification characteristics under California or federal law such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, 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).

- Source—We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.
- Business purpose for collection—We collect this data to market to clients and potential clients and service existing clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, preventing fraud, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.
- Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf, and with governmental entities. We do not share this information with affiliates for marketing purposes.

**D.** Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

- Source—We collect this data from the consumer, the consumer's transactions within an account, counterparties to these transactions, and from government agencies, registries or public records.
- Business purpose for collection—We collect this data to comply with applicable law, market to clients and service clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, preventing fraud, processing payments, providing advertising or marketing services, or providing similar services.
- Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf, and with governmental entities. We do not share this information with affiliates for marketing purposes.

- E.** Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.
- Source—We collect this data from reviewing the consumer's electronic browsing history on our website.
  - Business purpose for collection—We collect this data to market to clients, provide advertising or marketing services, or similar services, and prevent fraud.
  - Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf.
- F.** Geolocation data.
- Source—We collect this data from reviewing the geolocation data revealed when a consumer accesses our website.
  - Business purpose for collection—We collect this data to market to clients, provide advertising or marketing services, or similar services, and prevent fraud.
  - Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf.
- G.** Audio, electronic, visual, thermal, olfactory, or similar information.
- Source—In compliance with any applicable notice requirements, we may record phone calls.
  - Business purpose for collection—We collect this data as may be required by law or to verify trade or other instructions given to us.
- H.** Parties with whom information was shared—We share this information with service providers so that they can store information on our behalf.H. Professional or employment-related information.
- Source—We collect this data from the consumer.
  - Business purpose for collection—We collect this data to service existing clients, including maintaining or servicing accounts, providing advertising or marketing services, providing analytic services, or providing similar services.
  - Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf.
- I.** Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).
- Source—We collect this data from the consumer.
  - Business purpose for collection—We collect this data to service existing clients, including maintaining or servicing accounts, providing advertising or marketing services, providing analytic services, or providing similar services.

- Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf.
- J.** Inferences drawn from any of the above information to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
  - Source—We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.
  - Business purpose for collection—We collect this data to market to clients and potential clients, providing advertising or marketing services, providing analytic services, or providing similar services.
  - Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf.

## Sale of Personal Information

Your privacy is our priority, and we do not monetize your personal information by selling it to third parties.

## Consumer Rights under CCPA

The CCPA provides Consumers with certain rights regarding their Personal Information. If you are a Consumer (hereafter “you” or “your” refers to a Consumer), this notice describes your CCPA rights and explains how to exercise your rights.

If you are a California resident, you have the right to request that we:

- Disclose to you the following information covering the 12-month period prior to your request (“Request to know”):
  1. The categories of Personal Data we collected about you and the categories of sources from which we collected the Personal Data;
  2. The business or commercial purpose for collecting Personal Data about you;
  3. The categories of third parties to whom we disclosed Personal Data about you, and the categories of Personal Data disclosed; and
  4. The specific pieces of Personal Data we collected about you;
- Delete Personal Data we collected from you (“Request to Delete”).
- Correct inaccurate personal information that we maintain about you (“Request to Correct”).

In addition, you have the right to be free from discrimination by a business for exercising your CCPA privacy rights, including the right as an employee, applicant, or independent contractor not to be retaliated against for exercising your CCPA privacy rights.

## Right to Access

You have the right to request, up to two times every 12 months, that we disclose to you the following:

- The categories of personal information we have collected about you.
- The categories of sources from which such personal information is collected.
- The business or commercial purpose for collecting your personal information.
- The categories of personal information about you disclosed for a business purpose during the last 12 months and the categories of third parties to whom such personal information was disclosed.
- The specific pieces of personal information we have collected about you.

You have the right to request a portable copy of your Personal Information.

We will disclose the applicable information specified above to you upon receipt of your verifiable consumer request. *See “Submitting a Verifiable Consumer Request” section below.*

## Right to Deletion

You have the right to request that we delete any personal information about you which we have collected from you, subject to certain exceptions allowed under applicable law.

## Submitting a Verifiable Consumer Request—How to Exercise Rights of Disclosure or Deletion

We are required to provide the information specified above to you, or delete information in response to your request, only upon receipt of a verifiable consumer request. Your request must provide information to us that enables us to verify your identity (and, as applicable, of your authorized representative) in order for us to respond to your request. Upon receiving a request pursuant to this Policy, we will confirm receipt within 10 days and provide you with information about how we will verify and process the request. We will take reasonable steps to verify your identity (or the identity and authority of your authorized representative) prior to responding to your requests under CCPA. You agree to respond to reasonable requests by us for additional information to enable us to verify your identity in connection with your requests for information or deletion of information under the CCPA.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable

consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to confirm the requestor's identity or authority to make the request.

To exercise an access, data portability, correction or deletion request as described above, please submit a verifiable consumer request to us in one of the following ways:

- Send an email to [Privacy@abacuswealth.com](mailto:Privacy@abacuswealth.com) to inquire as to which elements of your information it's possible for us to delete. Please indicate in the subject "Verifiable Consumer Request."
- Submit a request through the Do Not Sell My Information option on the Abacus website.
- If you would like to close your account, please contact your Wealth Manager.

Once your request is verified, we will promptly take steps to disclose and deliver, free of charge to you, the personal information required by the CCPA. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We will deliver the information to you by mail or electronically within 45 days of receipt of your request, or such additional time as may be permitted under the CCPA.

## Right to Opt-Out of the Sale of your Personal Information

We have not sold personal information about you to third parties in the twelve (12) months prior to the date of this California Privacy Policy and will not sell personal information about you until further notice. If we change our practices in the future for any new information that we collect from you, we will notify you by updating this California Privacy Policy. To opt out of the sale or share of your personal information, send an email to [Privacy@abacuswealth.com](mailto:Privacy@abacuswealth.com) stating that you wish to opt out of the sale or sharing of your personal information or submit a request through the Abacus website.

## Personal Information of Minors

We may collect personal information of minors for UGMA and UTMA custodial accounts. We follow all local legal requirements with respect to the collection and processing of a minor's personal information.

## Retention

We have established retention periods and requirements to retain the categories of Personal Information described above for as long as is necessary for our business and operational purposes such as audits and reporting, and for our legal and regulatory compliance obligations, such as books and records requirements and legal holds.

## Right to Nondiscrimination

We will not discriminate against you because you elect to exercise any of your rights under the CCPA including, but not limited to:

- Denying goods or services to you.
- Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties on you.

- Providing a different level or quality of goods or services to you.
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

None of the foregoing, however, prohibits us from charging you a different price or rate, or from providing a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to us by your data.

## Security of Personal Information

We seek to protect Personal Information by implementing and maintaining reasonable physical, electronic, and procedural security measures and safeguards designed to protect Personal Information within our organization. Our employees, consultants, temporary workers and data processors (i.e., those who process your personal information on our behalf and for the purposes listed above) who have access to, and are associated with, processing your personal information are obligated to respect the confidentiality of your personal information and must comply with Abacus' Privacy Policy.

## Changes to this California Privacy Notice

We reserve the right to change this California Privacy Notice at any time. If we propose to make any material changes, we will notify you by posting a notice on our website and/or by issuing an email to the email address listed by account holder(s). You acknowledge that it is your responsibility to maintain a valid email address as an account holder, and to review our website, Privacy Policy, and this California Privacy Notice periodically in order to be aware of any modifications. If you object to any changes to the revised Privacy Policy or this California Privacy Notice, you can stop using our Services and close your account with us. However, if you continue to use our Services (including the Website) after we publish a new or updated California Privacy Notice, you acknowledge that such continued use means that the treatment of your personal information will be subject to the new or updated California Privacy Notice.

## Contact for More Information

If you have any questions or comments about this Notice, the ways in which Abacus collects and uses your information described herein, your choices and rights regarding such use, or wish to exercise your rights under California law, please contact us at [Privacy@abacuswealth.com](mailto:Privacy@abacuswealth.com). A copy of our Corporate Privacy Policy can be found on the Abacus website.