



## Privacy Policy

Updated April 3, 2024

This Policy describes how Renew Wealth Management, LLC ("Renew," "we," "us") collects, uses, and shares personal information when providing wealth management and financial planning services to clients. Any person or entity to whom Renew provides or provided services or products is a "client." Prospects who share personally identifiable information with Renew are also treated as clients under this Privacy Policy.

### Introduction

Financial companies choose how they share consumer's personal information. Federal law gives consumers the right to limit some, but not all, sharing. Federal law also requires Renew to tell clients what we do with their personal information. Please read this notice carefully to understand what we do.

### Collecting Information

Renew collects personally identifiable information from clients in the course of providing wealth management and financial planning services. The types of personal information collected and shared depend on the services provided to the client. Information can include, but is not necessarily limited to, name, date of birth, social security number, marital status, contact information, account numbers, transaction history, income, payment history, employment history, assets, investment experience, risk tolerance, account information, retirement assets, estate planning information, and family information.

### Sharing Information

Renew stores, processes, maintains, and uses our clients' personally identifiable information in order to provide clients support and services. Renew may share such information:

- To complete transactions directed or authorized by the client or if requested by the client;
- To provide services to the client;
- To contractors, vendors, and other third parties Renew uses to support our business and provide services to clients, with those third parties bound by contractual obligations to keep the information confidential and use it only for the purposes for which it was disclosed to them;
- As required by applicable law;
- In circumstances we believe it is necessary to investigate, prevent, or react to illegal activities, suspected fraud, or violations; and
- With affiliates for their everyday business purposes if about clients' transactions and experiences.

Clients can limit the above sharing.

## **SMS Campaign Consent Policy for Renew Wealth Management LLC**

### **Introduction:**

At Renew Wealth Management LLC, we establish transparent and respectful communication with our clients through our SMS campaigns. These campaigns are intended for service notifications and communication responses.

### **Method of Consent:**

Consent to participate in our SMS campaigns is obtained when a client provides a verbal agreement or when they initiate a calendar appointment request through our website at [www.renewwealthmgmt.com](http://www.renewwealthmgmt.com). In each instance, we ensure that the client is fully informed about the nature of the SMS campaign and their consent is explicitly recorded.

### **Opt-In Evidence:**

For each consent received, Renew Wealth Management LLC maintains a secure log detailing the client's phone number, the date, time, and the specific method of consent—verbal confirmation or calendar appointment request.

### **Consent Withdrawal:**

Clients may withdraw their consent to receive SMS messages from Renew Wealth Management LLC at any time by replying "STOP" to any message or by reaching out to our customer service team through the contact information provided below.

### **Age Verification:**

We verify that each client providing consent is of legal age in their jurisdiction during the opt-in process.

### **Consent Renewal:**

To ensure ongoing compliance and client satisfaction, we will seek to renew consent annually, providing clients with a straightforward method to reaffirm their desire to receive SMS communications.

We DO NOT share clients' mobile phone numbers with third parties for their marketing purposes.

Renew does not jointly market with non-affiliates and does not share information with non-affiliates to market to clients, although we may refer clients to a non-affiliate who a client may contact at their discretion.

## Security

Renew takes commercially reasonable steps to protect clients' information from loss, misuse, unauthorized access, disclosure, or destruction in accordance with applicable law. No Internet, e-mail or electronic operating system is ever fully secure, so please take care in deciding what information is provided to Renew.

Please note that Renew does not send emails to clients requesting billing, login, user ID or password information. If a client receives a suspicious email requesting personal or account information purporting to be from Renew, we ask that the client report it to us.

Renew takes commercially reasonable steps to ensure that information remains secure when it is disposed of after it is no longer required to be maintained. Such steps shall include shredding paper documents and records prior to disposal, requiring off-site storage vendors to shred documents maintained in such locations prior to disposal, and destroying data on electronic media so the information can no longer be read or reconstructed.

## Your Privacy Rights

For clients who are California residents, please see our Privacy Notice for California Residents below regarding your rights under the California Consumer Privacy Act (CCPA). Renew does not sell clients' personal information.

## Modifications

We may, in our sole discretion, modify the Privacy Policy from time to time. If we make material modifications, we will notify all our clients as required by applicable law.

## Contact Information

If you have any questions about this Privacy Policy, please contact us at:

Renew Wealth Management, LLC  
Attn: Compliance  
2881 Hokie Lane  
Alexandria, VA 22306  
Email: [compliance@renewwealthmgmt.com](mailto:compliance@renewwealthmgmt.com)  
Website: [www.renewwealthmgmt.com](http://www.renewwealthmgmt.com)

Effective 01/12/2024

## Privacy Notice for California Residents

This Privacy Notice supplements the information contained in Renew's Privacy Policy and applies solely to clients, visitors, users, and others who reside in the State of California ("consumers" or "you").

## Information Collected

In the past 12 months, Renew has collected the following categories of personal information from clients:

Category	Examples	Collected
A. Identifiers	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
B. 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, debit 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
C. Protected classification characteristics under California or federal law	Includes marital status, age (40 years or older), citizenship, sex and, veteran or military status.	YES

D. Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voice recordings, iris or retina scans, keystroke, gait, or other physical patterns, and sleep.	NO
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. The only reason why "Yes" has been indicated is because we capture your activity on our Websites.	YES
G. Geolocation Activities	Physical location or movements.	NO
H. Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information. The only reason why "Yes" has been indicated is because we capture audio and electronic information through interactions.	YES

I. Protected classification characteristics under California or federal law	Current or past job history or performance evaluations. The only reason “Yes” has been indicated is because we capture some job history.	YES
J. 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
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

[List categories of personal information collected, using same categories as in original notice]

Renew obtains this personal information directly from clients or their agents, indirectly from clients through providing services to them, from activity on our website, and from third parties that interact with us in connection with the services we perform.

- To provide you with information, products or services that you request from us.
- To fulfill or meet the reason for which the information is provided.
- To provide you with email alerts, event registrations, and other notices concerning us that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and product / service development.
- As necessary or appropriate to protect the rights, property, or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

#### Use of Personal Information

Renew may use or disclose the personal information we collect for the business purposes described in the Privacy Policy. We will not collect additional categories of personal information or use it for materially different, unrelated, or incompatible purposes without providing you notice.

#### Sharing Personal Information

In the past 12 months, Renew has disclosed the following categories of personal information for a business purpose:

[List categories of personal information disclosed, using same categories as in original notice]

We disclose your personal information to our affiliates, service providers, and third parties to whom you authorize us to disclose it in connection with the services we provide.

**Renew does not sell personal information. In the past 12 months, we have not sold any personal information.**

#### Your Rights under CCPA

The CCPA provides California consumers with specific rights regarding their personal information, as detailed in the Privacy Policy. To exercise your right to access, data portability, or deletion of your personal information, please submit a verifiable request using the contact information provided.

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

**Access to Specific Information and Data Portability Rights:** You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.

- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

*Deletion Request Rights:* You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable request, we will delete (and direct our service providers to delete) your personal information from our records unless an exception applies.

Please note that we may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

*Exercising Access, Data Portability, and Deletion Rights:* To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us at the mail address or email address noted below.

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 also make a verifiable consumer request on behalf of your minor child. You may only submit a request for access or data portability twice within a 12-month period. Such request must (a) provide sufficient information that allows us to reasonably verify the person about whom we collected personal information or an authorized representative of the same, and (b)



describe your request with sufficient detail that allows us to understand, evaluate, and respond to the request.

Please note that we cannot respond to requests 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. Renew will only use personal information provided in the request to verify the requestor's identity or authority to make it. Making a verifiable consumer request does not require you to be a client or investor with us.

*Response Time and Format:* We endeavor to substantively respond to a verifiable California consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), Renew will inform you of the reason and extension period in writing.

If you are a client or investor of ours, we will deliver our written response electronically (or mail if you have opted out of electronic delivery). If you are not a client or investor of ours, we will deliver our written response electronically or by mail. Please note that any disclosures we provide will only cover the 12- month period preceding our receipt of the verifiable request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to verifiable request unless it is excessive, repetitive, or manifestly unfounded. 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 the request.

## NON-DISCRIMINATION

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not (a) deny California consumers goods or services, (b) charge California consumers different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties, (c) provide California consumers with different level or quality of goods or services, or (d) suggest that California consumers may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, Renew may offer Californians certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Participation in a financial incentive program requires CA Individual's prior opt-in consent, which may be revoked at any time.

## OTHER CALIFORNIA PRIVACY RIGHT

California's "Shine the Light" law (Civil Code Section § 1798.83) permits Users of Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email using contact information provided in this Policy.

#### Changes to Privacy Notice

We reserve the right to amend this Privacy Notice at our discretion and at any time. When we make changes, we will notify you by email or through a notice on our website.