

## FACTS

### WHAT DOES CHOREO DO WITH YOUR PERSONAL INFORMATION?

#### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

#### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Account balances and account transactions
- Investment experience and retirement assets

#### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Choreo chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Choreo share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We don't share.
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We don't share.
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	No	We don't share.

#### To limit our sharing

- Call (312) 702-1680

**Please note:**

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

#### Questions?

Call (312) 702-1680 or go to [choreoadvisors.com](http://choreoadvisors.com)

Who we are	
Who is providing this notice?	Choreo, LLC, Choreo Partner Alliance, LLC, Choreo Insurance Agency, LLC, Choreo Tax Services, LLC
What we do	
How does Choreo protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <p>All employees are bound by our Code of Ethics and policies to maintain the confidentiality of your personal information and to prevent unauthorized use, access to, or disclosure of your personal information.</p>
How does Choreo collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ open an account or seek advice about your investments</li> <li>■ tell us about your investment or retirement portfolio or provide account information</li> <li>■ make deposits or withdrawals from your account</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.
Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Choreo's affiliates include Choreo Partner Alliance, LLC, Choreo Insurance Agency, LLC, Choreo Tax Services, LLC, and Parthenon Capital Partners, a private equity firm, and companies owned by the Parthenon funds.</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Choreo does not share with nonaffiliates so they can market to you.</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <i>Choreo doesn't jointly market.</i></li> </ul>
Other important information	
State laws may give you additional rights to limit sharing. If a state law requires us to give you the right to opt-out prior to disclosure of your personal information, we will not disclose your information if you exercise your right to opt-out.	

We are committed to protecting your privacy when you provide data to us. This Privacy Policy (“Privacy Statement” or “Statement”) sets out the privacy practices for Choreo, LLC and its affiliates, Choreo, LLC, Choreo Partner Alliance, LLC, Choreo Insurance Agency, LLC and Choreo Tax Services, LLC (“Choreo,” “us,” or “we”) with respect to information, including Personal Data (which means any information relating to an identified or identifiable natural person), we obtain from and about our employees, prospects, and clients.

Please read the information below to learn about the Personal Data collected about you and how it is used. The information we are collecting now will be treated consistently with this Statement. We may make changes to this Statement in the future, so please review the Statement regularly. Clients for whom we handle Personal Information under the federal Gramm-Leach-Bliley Act should also review our [GLBA Privacy Notice](#).

## **1. Personal Data Collected**

### **1.1. Sources of Personal Data**

Personal Data is collected directly from you when you:

- Complete an online form on our website
- Complete an employment application
- Respond to online event invitations
- Complete paper contact forms
- Call or email one of our locations

It is your responsibility to provide us with accurate data, and to provide us with updated Personal Data when it changes. We also collect information about you via automated means when you visit our website.

### **1.2. Categories of Personal Data**

The Personal Data collected from you may include:

#### **1.2.1. Identifiers**

- Name
- Postal address
- Telephone number
- Facsimile number
- Email address

We use this information to:

- Stay in touch with you and manage our relationship
- Provide services to you
- Communicate with you about your requests, questions and comments
- Process employment applications
- Comply with legal and regulatory requirements, relevant industry standards, and our policies

#### **1.2.2. Personal information categories described in the California Customer Records statute**

- Social Security number
- Driver's license number
- Passport number
- Account number

We use this information to:

- Provide client services to you
- Manage and develop our relationship with you
- Complete transactions and process paperwork
- Protect against identity theft, prevent fraud, and other criminal activity

#### **1.2.3. Characteristics of protected classifications**

- Disability
- Familial status
- National origin
- Gender
- Ethnicity
- Race
- Religion

- Sex
- Age
- Veteran status

We use this information to:

- Process employment applications
- Manage and develop our relationship with you

#### **1.2.4. Commercial information**

- Financial information to complete a transaction

We use this information to:

- Manage and develop our relationship with you as a prospect and/or client

#### **1.2.5. Biometric information**

- Fingerprints

We use this information to:

- Currently we do not intentionally collect biometric information from individuals; however, occasionally we may incidentally come into possession of this information

#### **1.2.6. Internet or other electronic network activity information**

- IP addresses

We use this information to:

- Improve the functionality of our website
- Manage our business, diagnose technical and service problems, and identify users of our website
- Protect against identity theft, prevent fraud and other criminal activity
- Operate, evaluate, and improve our business
- Perform data analyses and other processing
- Manage and develop our relationship with you or the organization you represent

### **1.2.7. Professional or employment-related information**

- Employment applications
- Service provider/vendor/third party agreements
- RFPs
- Due diligence questionnaires

We use this information to:

- Process employment applications
- Manage and develop our relationship with you and/or the organization you represent

### **1.2.8. Education information**

- Employment applications

We use this information to:

- Process employment applications

## **2. With Whom We Share Personal Data**

We do not sell or otherwise share personal information about you except as described in this Statement. We may share personal information with third parties who perform services on our behalf. These third parties are not authorized to use or disclose the information, except as necessary to perform services on our behalf or comply with legal requirements. We may also share the Personal Data we obtain with our affiliates.

We may disclose information about you:

- If we are required to do so by law, regulatory obligation, or legal process;
- In response to requests by government agencies, such as law enforcement authorities or regulatory bodies;
- For the purpose of or in connection with legal proceedings, or otherwise for the purpose of establishing, exercising, or defending our legal rights;
- When we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity; or

- In the event we sell or transfer all or a portion of our business or assets.

### **3. Retention of Data**

We will keep your Personal Data only for as long as reasonably necessary to fulfill the purposes for which Personal Data is collected as stated herein; for as long as is necessary for the performance of the contract between you and us, if any; and to comply with legal and statutory obligations, such as in tax, regulatory, and corporate laws. When we no longer need your Personal Data for our purposes, including regulatory purposes, we will destroy, delete, or erase that Personal Data or convert it into an anonymous form.

### **4. Security of Data**

We will take reasonable steps to protect your Personal Data in our possession from loss, misuse, unauthorized access, disclosure, alteration, and destruction. For example, we use security measures including safeguarding and monitoring our network and controlling access to our files, equipment, and buildings.

### **5. Your California Privacy Rights**

If you are a resident of the state of California, the following rights are available to you under the California Consumer Privacy Act.

#### **5.1. Right to access**

You have the right to request that we disclose the categories of Personal Data collected (which may also be referenced in our GLBA Privacy Policy), the categories of sources from which Personal Data is collected, the business or commercial purpose for collection, the categories of third parties with which we share Personal Data, and the specific pieces of Personal Data that we have about you. You also have the right to request that we provide your Personal Data to you in a readily useable format.

#### **5.2. Right to request deletion**

You have the right to request that we delete Personal Data that we collected from you. Note, however, that certain requests to delete Personal Data may be denied if we are required to retain the information as a matter of law, the information is necessary for detecting security incidents, exercising free speech, protecting or defending against legal claims, or for internal uses reasonably aligned with consumer expectations.

#### **5.3. Right to non-discrimination**

You have the right not to receive discriminatory treatment by us for exercise of these privacy rights. We do not offer financial incentives related to the provision of data.

#### **5.4. Authorized agent**

You have the right to designate an authorized agent to make these requests on your behalf.

To exercise any of these rights, please call 1-312-702-1680, press Option 2 or email us at [WMCompliance@choreoadvisors.com](mailto:WMCompliance@choreoadvisors.com). Before we can begin to process your request, we must first verify your identity. We will use the following points of information for our verification process.

- A unique ID assigned to you by Choreo (e.g. Client ID, Vendor ID)
- Email Address
- Full Name
- Phone Number
- Mailing Address
- Employer, Service Provider, 3rd Party Vendor or Organization's Name you are associated with

Request made for categories of information about you require that we verify your identity using at least two of the points of information listed above. Requests made for specific information require that we use at least three points of information listed above. Additionally, you will be required to provide a document signed under penalty of perjury affirming that you are the consumer who you are making the information request about. For requests made for the deletion of information Choreo will require two or three of the points of information above, depending on the sensitivity of the information requested to be deleted.

#### **6. Contact Information**

Unless otherwise stated, Choreo, LLC is a data controller for Personal Data processed subject to this Statement. If you have any questions about this Statement or if you believe that your Personal Data has been processed or disclosed in violation of this Statement, please contact us by sending an email to [WMCompliance@choreoadvisors.com](mailto:WMCompliance@choreoadvisors.com), or a letter to:

Choreo, LLC

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