



## CALIFORNIA PRIVACY POLICY

California residents have additional rights over their personal information (“PI”) that is not already protected by existing federal privacy laws. This California Privacy Policy describes the personal information that Benjamin F. Edwards & Co. (BFE) and Benjamin F. Edwards Wealth Management, LLC (EWM) (collectively, “we,” “us” and “our”) collect about you, the rights you have with respect to that information, and how you can exercise those rights. This information supplements the information contained in our Privacy Notice.

### Right to Know.

You have the right to request that we disclose what personal information we collect, use, disclose and sell. (We do not sell your personal information.)

### Categories of personal information we may have collected about you in the last 12 months, why we have collected it, and whether we have disclosed that information for a business purpose.

Depending on your relationship with us and your activities with us, we collect personal information about you. In some instances, we need to share certain personal information with others to carry out our business purposes. The following table identifies the categories of personal information we may have collected about you, the categories of sources from which we collect personal information, our business or commercial purpose for collecting the personal information, whether we have disclosed the personal information for a business purpose, and the categories of third parties to whom we have disclosed personal information.

Categories of PI collected in the past 12 months	Categories of sources from which we collect PI	Business or commercial purpose for collecting the PI	PI disclosed for a business purpose?	Categories of third parties to whom we disclose PI for a business purpose
Identifiers, such as your name, address, Internet Protocol (IP) address, unique personal identifier (device identifier), e-mail address, account name, social security number, driver’s license number, passport number, telephone number(s) and signature.	<ul style="list-style-type: none"> <li>From you, when you open an account, visit our website, or request information.</li> <li>From third parties, such as credit bureaus, affiliates, and other companies.</li> </ul>	<ul style="list-style-type: none"> <li>To maintain and service your accounts and to provide financial products and services to you.</li> <li>To comply with legal requirements.</li> <li>To respond to your requests, manage relationships.</li> <li>To market financial products and services to you.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM).</li> <li>Service providers with whom we have contracts to provide services to us, such as effecting transactions on your behalf; maintaining and servicing your accounts; marketing our products and services; managing our client</li> </ul>

Categories of PI collected in the past 12 months	Categories of sources from which we collect PI	Business or commercial purpose for collecting the PI	PI disclosed for a business purpose?	Categories of third parties to whom we disclose PI for a business purpose
		<ul style="list-style-type: none"> <li>To detect fraud and security incidents and analyze activity on our websites.</li> </ul>		<p>relationships; analyzing activity on our website; maintaining the security, confidentiality and integrity of our systems and detecting fraud.</p> <ul style="list-style-type: none"> <li>Financial institutions with whom we have joint marketing agreements (unless you have instructed us not to share your information for this purpose).</li> <li>We have entered into an agreement with a number of other firms that permits your financial advisor to take certain limited information - your name, address, telephone number, e-mail address and account title - to contact you to service your accounts if they join another firm that is a party to the same agreement.</li> </ul>
Additional personal information such as age, citizenship, marital status, medical condition, physical or mental disability, gender.	<ul style="list-style-type: none"> <li>From you, when you open and maintain accounts with us.</li> <li>From third parties, such as credit bureaus, affiliates, and other companies.</li> </ul>	<ul style="list-style-type: none"> <li>To maintain and service your accounts and provide financial products and services to you.</li> <li>To respond to your requests, manage relationships.</li> <li>To market financial products and services to you.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM).</li> <li>Service providers.</li> <li>Financial institutions with whom we have joint marketing agreements (unless you have instructed us not to share your information for this purpose).</li> </ul>
Commercial information, such as records of personal property, products or services purchased or considered.	<ul style="list-style-type: none"> <li>From you, when you open and maintain accounts with us, provide information to us, seek financial advice or buy or sell securities.</li> <li>From third parties, such as credit bureaus, affiliates, and other companies.</li> </ul>	<ul style="list-style-type: none"> <li>To maintain and service your accounts and provide financial products and services to you.</li> <li>To respond to your requests, manage relationships.</li> <li>To market financial products and services to you.</li> </ul>	Yes.	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM).</li> <li>Service providers.</li> <li>Financial institutions with whom we have joint marketing agreements (unless you have instructed us not to share your information for this purpose).</li> </ul>

Categories of PI collected in the past 12 months	Categories of sources from which we collect PI	Business or commercial purpose for collecting the PI	PI disclosed for a business purpose?	Categories of third parties to whom we disclose PI for a business purpose
Internet or other electronic network activity, such as your interaction with our websites and, if applicable, your interactions with your account(s).	<ul style="list-style-type: none"> <li>From you, when you visit our website(s) and when you log into your account(s).</li> <li>From our service providers who monitor our websites and electronic account activity.</li> </ul>	<ul style="list-style-type: none"> <li>To provide financial products and services to you.</li> <li>To maintain and service your account(s).</li> <li>To respond to your requests, manage relationships.</li> <li>To detect fraud and security incidents and analyze activity on our websites.</li> <li>To improve our website.</li> <li>To market financial products and services to you.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM).</li> <li>Service providers.</li> <li>Financial institutions with whom we have joint marketing agreements (unless you have instructed us not to share your information for this purpose).</li> </ul>
Audio, electronic and visual information, such as voice recordings when you call us on a recorded line, or your photograph if you visit a location with security cameras.	<ul style="list-style-type: none"> <li>From you, such as when you call us on a recorded line, or when you visit a location with security cameras.</li> <li>From our service providers who assist us with customer service and security.</li> </ul>	<ul style="list-style-type: none"> <li>To provide financial products and services to you.</li> <li>To provide customer service and maintain accounts.</li> <li>To detect fraud and security incidents, and to prosecute those responsible.</li> <li>To maintain the security of our premises.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM).</li> <li>Service providers.</li> </ul>
Professional or employment-related data, such as your work history and income.	<ul style="list-style-type: none"> <li>From you, when you open and maintain accounts with us.</li> <li>From third parties, such as credit bureaus, affiliates, and other companies.</li> </ul>	<ul style="list-style-type: none"> <li>To provide financial products and services to you.</li> <li>To maintain and service your account(s).</li> <li>To market financial products and services to you.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM).</li> <li>Service providers.</li> <li>Financial institutions with whom we have joint marketing agreements (unless you have instructed us not to share your information for this purpose).</li> </ul>
Education information, such as institutions attended, degree(s) obtained and year(s) of graduation.	<ul style="list-style-type: none"> <li>From you, when you open and maintain accounts with us.</li> </ul>	<ul style="list-style-type: none"> <li>To provide financial products and services to you.</li> <li>To market financial products and services to you.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM).</li> <li>Service providers.</li> <li>Financial institutions with whom we have joint marketing agreements (unless you have instructed us not to share your information for this purpose).</li> </ul>
Inferences drawn from any of the information that we collect about you to create	<ul style="list-style-type: none"> <li>From you, when you open and maintain accounts with us, request</li> </ul>	<ul style="list-style-type: none"> <li>To provide financial products and services to you.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Our affiliates (BFE and EWM).</li> <li>Service providers.</li> </ul>

Categories of PI collected in the past 12 months	Categories of sources from which we collect PI	Business or commercial purpose for collecting the PI	PI disclosed for a business purpose?	Categories of third parties to whom we disclose PI for a business purpose
a profile about you and your preferences.	information, or visit our website(s). <ul style="list-style-type: none"> <li>From third parties, such as credit bureaus, affiliates, and other companies</li> </ul>	<ul style="list-style-type: none"> <li>To maintain and service your account(s).</li> <li>To market financial products and services to you.</li> </ul>		<ul style="list-style-type: none"> <li>Financial institutions with whom we have joint marketing agreements (unless you have instructed us not to share your information for this purpose).</li> </ul>

### Right to Request Deletion of Personal Information.

You have the right to request that we delete your personal information.

### How to Submit a Request to Know or a Request to Delete Personal Information.

To submit a request to know what personal information we have collected about you, or a request that we delete your personal information, call us at (855) 382-1600 (toll-free) or by contacting us by e-mail at [privacy@benjamedwards.com](mailto:privacy@benjamedwards.com).

**Our response.** We will endeavor to respond to your request within 45 days. If we require more time to respond (up to a total of 90 days), we will inform you of the reason and extension period in writing. If we deny your request, we will explain the reason(s) for our denial.

**We will verify your identity.** If you submit a request to know or delete personal information, we will verify your identity. We will match pieces of personal information provided by you with personal information maintained by us that we have determined are reliable. We may also require that you submit a signed declaration under penalty of perjury stating that you are the individual whose personal information is the subject of the request.

In some instances, there is no reasonable method by which we can verify your identity. This is the case, for example, when you visit our website. In that circumstance, we collect your Internet Protocol address and information about your activity on our website, but we do not associate this information with any named actual person or account.

**You may designate an authorized agent to submit a request on your behalf.** You have the right to authorize another person to submit a request to know your personal information or to delete your personal information. To have another person submit a request on your behalf, call us at (855) 382-1600 (toll-free) or by contacting us by e-mail at [privacy@benjamedwards.com](mailto:privacy@benjamedwards.com) and tell us that you would like to authorize another person to submit a request to know or delete on your behalf. You will need to provide us with written permission authorizing the other person to submit a request to know or delete on your behalf. We will give you instructions on how to send the written authorization to us. We will still verify your identity and will verify that you have given your authority to another person.

### **Right to Opt Out of the Sale of Your Personal Information.**

If a business sells your personal information, you have the right to opt-out of the sale of that information. **We have not sold and do not sell your personal information.**

We do not have actual knowledge that it sells the personal information of minors under 16 years of age.

### **Right to Non-Discrimination for the Exercise of a Consumer's Privacy Right.**

You have the right not to receive discriminatory treatment by us because you have exercised your privacy rights. This means that you have the right not to be denied goods or services, or charged different prices, just because you have exercised your privacy rights.

### **Contact for more information.**

If you have questions or concerns about our privacy policies and practices, you may contact us by calling us at (855) 382-1600 (toll-free) or by sending us an e-mail at [privacy@benjamedwards.com](mailto:privacy@benjamedwards.com). Please do not send us your account number via e-mail.

### **Date Privacy Policy was last updated:**

August 27, 2020.