



PRIVACY POLICY NOTICE

Legacy Wealth Management Group, Inc. ("LWMG") recognizes that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. To provide accurate and efficient service, we collect and maintain certain personal information, and we are committed to safeguarding it in accordance with federal and state standards.

WHAT INFORMATION WE COLLECT

We collect "Nonpublic Personal Information" (NPI) and "Sensitive Customer Information" (e.g., "any information that can be used to authenticate an individual's identity, such as SSNs, biometric records, or account login credentials") about you from the following sources:

- Information you provide: Name, address, Social Security number, assets, and income provided on applications or other forms.
- Communications: Electronic, telephone, written, or in-person interactions with you or your authorized representatives (e.g., attorneys, accountants).
- Account activity: Data regarding your brokerage accounts, transaction history, balances, and inquiries.
- External Data: Information received from other financial institutions (e.g., custodians or previous advisers) relating to your accounts.

WHAT INFORMATION WE DISCLOSE

We do not sell, share, or disclose your nonpublic personal information to non-affiliated third-party financial companies for their own marketing purposes. We disclose information only as permitted or required by law, specifically:

- To service providers (e.g., broker-dealers, custodians, independent managers) necessary to effect transactions and provide authorized services.
- To professional licensing authorities or auditors assessing our compliance with industry standards.
- To our attorneys, accountants, and other fiduciaries.
- To government agencies or regulatory bodies as required by law.

Service providers are contractually prohibited from using or sharing your information for any purpose other than the specific services authorized by LWMG.

SECURITY AND INCIDENT RESPONSE

LWMG maintains physical, electronic, and procedural safeguards designed to ensure the security and confidentiality of customer records and protect against unauthorized access.

- Access Control: We restrict access to your information to employees who need it to service your account.
- Artificial Intelligence (AI): LWMG may utilize secure, firm-approved Artificial Intelligence tools to improve operational efficiency. We ensure these tools comply with our strict data security standards and do not compromise the confidentiality of your personal information. This use is strictly limited to operational functions and does not involve storing or processing client personal information on insecure servers, nor is client data utilized to train publicly accessible AI models.
- Incident Response Program: In accordance with the May 2024 SEC amendments, LWMG maintains



a formal written program to detect, respond to, and recover from unauthorized access to customer information.

- **Customer Notification:** If we determine that "sensitive customer information" has been, or is reasonably likely to have been, accessed or used without authorization, we will provide you with a clear and conspicuous written notice as soon as practicable, but no later than 30 days after discovery of the incident. This notice will include a description of the incident, the type of information involved, and steps you can take to protect yourself.

ADDITIONAL INFORMATION FOR VIRGINIA RESIDENTS

Under the Virginia Consumer Data Protection Act (VCDPA), Virginia residents have specific rights regarding their "personal data" (as defined by Virginia law). LWMG extends these protections to our Virginia clients:

- **Right to Access:** You have the right to confirm whether we are processing your personal data and to access such data.
- **Right to Correct:** You have the right to request that we correct inaccuracies in your personal data, taking into account the nature of the data and the purposes of the processing.
- **Right to Delete:** You have the right to request the deletion of personal data provided by or obtained about you, subject to certain legal and regulatory retention requirements.
- **Right to Portability:** You have the right to obtain a copy of your personal data in a portable and readily usable format.
- **Right to Opt-Out:** You have the right to opt-out of the processing of personal data for purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects. Please note: LWMG does not sell your data or engage in targeted third-party advertising.

Exercising Your Rights: To exercise any of these rights, please submit a request to clientsupport@legacywealthadvisor.org. We will respond to your request within 45 days. If we decline to take action regarding your request, you have the right to appeal our decision by contacting us at the same email address.

ONGOING COMMITMENT AND CHANGES

- **Former Customers:** If you terminate our services, we will continue to adhere to the privacy practices described in this notice.
- **Annual Notice Exception:** Per SEC rules, we may not be required to send an annual privacy notice if we only share information under certain legal exceptions and have not changed our disclosure policies since your last notice.
- **Policy Updates:** We will provide notice of any material changes to this policy before they are implemented.

HOW TO CONTACT US

If you have any questions regarding our privacy policy, please contact us:

- Email: clientsupport@legacywealthadvisor.org
- Phone: (434) 266-1214