

Privacy Notice

Effective Date: December 2025

Our Commitment to You

ThePARTNERS Wealth Management ("ThePARTNERS", the "Adviser", "we", "our" or "us") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Adviser, as described here in our Privacy Notice ("Notice").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. ThePARTNERS protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

ThePARTNERS does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Notice.

This Notice also incorporates our obligations and your rights under the California Consumer Privacy Act ("CCPA") as amended by the California Privacy Rights Act ("CPRA").

Why you need to know?

Registered Investment Advisers ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What Information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

We may also collect any other information you choose to provide to us or that is necessary to deliver our services and comply with regulatory requirements.

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

We may also receive other information from third parties as needed to open, maintain, or service your accounts or to comply with regulatory obligations.

How Do We Use Your Information?

We use your personal information for one or more of the following business purposes:

- to provide investment advisory, financial planning and related services.
- to open, maintain, service, and administer your accounts.
- to process transactions and communicate with you about those transactions.
- to respond to your inquiries and requests.
- to perform due diligence, suitability, and know-your-client (KYC) obligations.
- to manage our relationship with you, including account reviews and ongoing communications.
- to comply with legal, regulatory, and compliance obligations (including recordkeeping, audits, and regulatory filings).

We may also use personal information for:

- detecting and preventing security incidents, fraudulent or illegal activity, or misuse of our services.
- debugging to identify and repair errors that impair existing intended functionality.
- internal research, analytics, and service improvement, consistent with our obligations to safeguard client information.

We do not use your personal information for purposes that are materially different, unrelated, or incompatible with those described in this Notice without providing you additional notice.

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

We also maintain role-based access controls so that only those personnel who have a business need to access particular client information may do so.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share ?	Can you limit?
Servicing our Clients - We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. As certain IARs of The Partners are also registered representatives of Purshe Kaplan Sterling ("PKS"), PKS will have access to your information for supervision purposes, even if you do not have accounts established with PKS.	Yes	No
Marketing Purposes - ThePARTNERS does not disclose, and does not intend to disclose, non-public personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where ThePARTNERS or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users - Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients - ThePARTNERS does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Retention of Personal Information

We retain personal information for as long as reasonably necessary to:

- provide advisory and related services.
- maintain business and financial records in accordance with applicable laws and regulations (including securities laws and recordkeeping obligations).
- protect, defend, or enforce our rights and the rights of our Clients.

Retention periods vary based on the type of information and our legal and regulatory obligations. The Firm retains personal information only for as long as necessary to fulfill the purposes described in this Notice, to comply with Rule 204-2 under the Advisers Act, or as otherwise permitted by law.

California Privacy Rights

This section applies solely to residents of the State of California, to the extent the personal information we process is subject to the CCPA/CPRA and is not otherwise exempt (for example, certain information collected, processed, sold, or disclosed pursuant to the Gramm-Leach-Bliley Act may be exempt).

If you are a California resident, you may exercise the following privacy rights under the CCPA/CPRA with respect to your personal information:

- **Right to Know / Access** – to request information about the personal information we collect,

- use, disclose, or retain.
- **Right to Request Deletion** – to ask that we delete personal information we have collected from you, subject to legal and regulatory exceptions.
- **Right to Correct** – to request that we correct inaccurate personal information we maintain about you.
- **Right to Limit the Use and Disclosure of Sensitive Personal Information** – to limit our use of sensitive personal information to only those purposes specifically permitted by the CCPA/CPRA.
- **Right to Non-Discrimination** – to be free from discriminatory treatment for exercising any of your privacy rights.

To exercise your rights, please contact us using the contact information provided below.

Children's Privacy

Our services are not directed at individuals below the legal age of majority. We do not knowingly collect data from children under 13 without parental consent.

Changes to our Privacy Notice

We will send you a copy of this Notice annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Notice and will provide you with a revised notice if the changes materially alter the previous Privacy Notice. We will not, however, revise our Privacy Notice to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent information sharing.

Privacy Questions, Comments, or Feedback

We verify who you are before giving you access to your data or making any changes to it by asking for certain information or documents to prove your identity. We will respond to your request within 45 days of verifying your identity. If we require more time to respond, we will notify you of the reason and extension period in writing.

If you have questions or feedback about this Notice or want to obtain a copy thereof, please contact Jeffrey Smith at jeffsmith@thepartnerswm.com or by phone at (800) 324-3010.