

## Privacy is #1

First of all, our number one priority at Jazz is your trust. We don't exist without our clients, and prospective clients' trust. Your privacy is essential to earning and keeping that trust. This tenet drives all of the decisions we make, as well as how we gather, use and store any information we acquire from you.

We created this Privacy Policy to be as clear and direct as possible about how we gather and use your information. To ensure your privacy we never ask you for personal data ("Personal Data") directly, nor will we ever solicit you for that personal data. We avoid wherever possible using third-party cloud-based tools that require us to share your Personal Data to use them. We will never rent, sell or trade your personal information to anyone. Ever.

## Policy Introduction

Jazz Wealth Managers, Inc. ("Jazz", "we", "us" and/or "our") operates a wealth management service ("Service"). Our Service is made available through our advisors and via our preferred broker. This Privacy Policy describes how Jazz treats your Personal Data when you use or evaluate our service.

For the purpose of this agreement a User is an individual who uses our website on any platform or device to evaluate our service, or for educational purposes, and a Client is an individual who signs our Client Agreement that entitles the Client to have her or his investment portfolio managed by Jazz. Our Privacy Policy, Terms of use and where applicable Client Agreement collectively govern your use or evaluation of our service.

## Information we collect

The types of information we collect depend on whether you are a User or Client. We collect Basic Data from you when you voluntarily provide information to us. Examples of instances when we collect emails, social media profiles, or names when you navigate our website or interact with our blog page, when you contact us to open an account, when you contact our client service email with questions or when you become a Client. Remember that Jazz never collects Personal Data.

## General

Jazz automatically records certain information ("Non-Identifiable" or "Aggregated Data") about your use or evaluation of our Service. Similar to other technology platforms and services, Jazz records information such as browsing activity, data displayed or clicked on (such as UI elements, ads, and links), and other information (such as browser type, IP address, date and time of access, cookie ID, and referrer URL). Along with cookies, Jazz may also use third-party tracking technology, such as Google Analytics, to record similar information regarding you and your activity on the Site.

## Information collected from users

We collect personal information such as name, address, telephone number and other optional information you may provide, such as your age, investable assets, and risk tolerance, which may include your financial goals and objectives, income information and other financial planning information about your household. This is collected in our client agreement and currently not on

our website.

We may collect your e-mail address and/or telephone number should you opt to engage via our website, email or dedicated telephone number with a member of our team.

Our preferred brokerage firm (Interactive Brokers) will collect account numbers and login credentials for the accounts (bank or brokerage) you choose to link to our Service, any challenge and/or security questions associated with those accounts and any information contained in those accounts.

### **Information Collection from Clients**

If you choose to become a Client, in addition to the information we collect from you as a User, as described above, we will provide you a secure, electronic link where our preferred broker will ask you for certain information, including, but not limited to, your full legal name, contact information, birth date, Social Security Number, citizenship, investment objectives, approximate net worth, and other regulatory disclosures that may be necessary and required under Federal and certain statutory law.

### **Use of information**

Jazz stores, processes, and maintains data related to you in order to provide client support, offer new products or services and provide our Service to Clients in accordance with the rules of regulatory bodies such as the Securities and Exchange Commission and FINRA. You may choose not to provide such information to us, but if you choose not to provide such information, you will not be able to become a Client.

We may share the information required to become a Client with our preferred brokerage firm solely for the purpose of allowing our brokerage firm to provide services to you.

Jazz may use your Basic Data to communicate with you regarding our Service or to tell you about blog posts or services that we believe will be of interest to you. If you decide at any time that you no longer wish to receive marketing communications from us, please follow the “unsubscribe” instructions provided in the communications. Please note that you cannot opt-out of administrative communications such as regulatory, billing or service notifications.

### **Information Sharing**

We will not sell, rent, or trade your Basic Data with any third parties except as required by law, such as when we reasonably believe it is necessary or appropriate to investigate, prevent, or take action regarding illegal activities, suspected fraud, front running or scalping, situations involving potential threats to the physical safety of any person.

There are certain circumstances, outlined below, in which we may share your Personal Data without further disclosure to you. From time-to-time, we hire other companies to perform certain business and technology related functions (e.g. mailing information, database maintenance and payment processing). In the case we hire another company to perform a function of this kind, we only provide them with the minimum information they need to perform their specific function. Jazz maintains strict physical, electronic and procedural safeguards that comply with federal standards to guard any of your Non-Public personal information.

Except as required by law or requested by regulatory authorities, Jazz agrees to maintain your non-public Personal Data in strict confidence, though we do not anticipate holding any records of this kind.

### **Your choices and/or obligations**

You may request deletion of personal information by emailing [support@jazzwealth.com](mailto:support@jazzwealth.com) and providing us enough information to identify your account and prove that you are the owner of the identified account. We will endeavor to make any deletion request effective as soon as reasonably practicable. However, we may retain residual information related to your account, as well as any data related to your trades, in accordance with applicable laws. In no case will we share any individual trading data unless required by regulators or other government bodies. You may decline to provide personal information to Jazz. Declining to provide personal information may disqualify you for Jazz services and Site features that require certain personal information.

### **Other important information**

#### **Security**

Jazz takes reasonable steps to protect your Basic Data from loss, misuse, and unauthorized access, alteration, disclosure, or destruction. No Internet, email, or electronic operating system that enables the transmission of data is ever fully secure or error free so, please take special care in deciding what information you send to us in this manner.

#### **Advertising**

We do not allow third-party advertising on our Website or reporting applications.

#### **Referral Program**

Jazz currently does not operate any referral program, but that doesn't mean we don't want you to tell your friends!

#### **Social Media and Links to Other Web Sites and Future Apps: “Third Parties”**

This Privacy Policy and these terms apply only to Jazz operated services and applications. This Site may contain links that access other web sites and apps that are not operated or controlled by Jazz. The policies described herein do not apply to Third Party websites or applications.

#### **Minors**

Jazz is not to be used by anyone under the age of 18 and, as such does not knowingly collect Basic or Personal Data from anyone under the age of 18. If you are under the age of 18, please do not submit any Personal Data to Jazz. If a parent or guardian becomes aware that his or her child under the age of 18 has provided us with personally identifiable information without his or her consent, he or she should contact us at [support@jazzwealth.com](mailto:support@jazzwealth.com) and we will delete such information from our files.

**Other**

This Privacy Policy may change from time to time. We will post any Privacy Policy changes and, if the changes are substantial, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes). Each version of this Privacy Policy will be identified at the top of the page by its effective date.

Privacy policy for Interactive Brokers,  
LLC.: <https://www.interactivebrokers.com/en/index.php?f=305>

This document constitutes Jazz's complete Privacy Policy for Jazz and the Services.

If you have questions or comments about this Privacy Policy, please email us at [support@jazzwealth.com](mailto:support@jazzwealth.com), by phone at 727.492.0314 or via physical mail at:

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