



FACTS	WHAT DOES GLOBAL RETIREMENT PARTNERS, LLC (“GRP”) 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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Social security number and date of birth</li> <li>• Income and net worth</li> <li>• Transaction history or account transactions</li> <li>• Contact information</li> <li>• Investment experience and risk tolerance</li> <li>• Account number(s) and balances</li> </ul> <p>When you are no longer our customer, we continue to share information about you as described in this notice.</p>	
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 GRP chooses to share; and whether you can limit this sharing.	
Reasons we can share your personal information	Does GRP Share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transactions, maintain your accounts(s) or respond to court orders and legal investigations	Yes	No
For our marketing purposes - to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes - information about your transactions and experiences	Yes	No
For nonaffiliates' everyday business purposes – to assist us in obtaining business or providing account maintenance or customer service to your account(s)	Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don't share
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share
To Limit our Sharing	<p>If you wish to limit our sharing, or provide affirmative consent to sharing, you may:</p> <ul style="list-style-type: none"> <li>• Call Cosmo Gould, Chief Compliance Officer, at 415-526-2753</li> <li>• Mail your request to Global Retirement Partners, LLC, 4340 Redwood Highway, Suite B-60, San Rafael, CA 94903</li> </ul> <p><b>Please note:</b> If you are a new customer, we can begin sharing your information from the date we provided you with 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</p>	
Questions?	Call Cosmo Gould, Chief Compliance Officer, at 415-526-2753	

Who we are	
Who is providing this notice?	Global Retirement Partners, LLC

What we do	
How does GRP protect my personal information?	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.
How does GRP 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</li> <li>• Enter into an investment advisory contract</li> <li>• Give us your contact and other information</li> <li>• Seek financial advice</li> <li>• Tell us about your investment or retirement portfolio</li> </ul> <p>We also collect your personal information from 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.</p>

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• <i>GRP shares with its affiliates.</i></li> </ul>
Nonaffiliates	<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>GRP does not share with nonaffiliates so they can market to you.</i></li> </ul>
Joint Marketing	<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>GRP jointly markets with nonaffiliated financial companies.</i></li> </ul>

**State Laws:** Certain individual states also have enacted privacy laws and regulations to protect their citizens. Our privacy practices comply with all applicable laws. If a state's privacy laws are more restrictive than those stated in this notice, we will comply with those laws. Depending on the law of the state, you may have the right to know what information we have collected and/or shared, the right to instruct us to delete certain information, the right to correct inaccurate or incomplete information, the right to "opt-out" our ability to share information, and/or the right to limit our use or sharing of information. For more information about your rights under state law or to exercise your state law rights, please make a written or phone request per the contact information above. Some requests may require us 45 days to prepare.

**Privacy Notice for California Residents.** This California Consumer Privacy Act Notice ("California Notice") supplements the information stated above and applies to residents of California. This Notice covers the information and our activities subject to the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, "CCPA").

When we use the term "personal information" for the California Notice, we are referring to information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household, such as your real name, alias, postal address, unique personal identifier, online identifier Internet Protocol (IP) address, email address, account name, social security number, driver's license number, passport number,

or other similar identifiers. Personal information does not include publicly available information and other information that is regulated by certain applicable laws that are exempted from the requirements of the CCPA.

This California Notice and the CCPA do not apply to personal information we collect as part of our current or former client relationship with you pursuant to other privacy laws, such as the Gramm-Leach-Bliley Act, Regulation S-P, and the Fair Credit Reporting Act. Therefore, depending on your relationship with us, the CCPA, and this section, may not apply to your personal information, even if you are a California resident. The information stated above describes how we use and disclose your financial information subject to those laws.

## 1. Your Rights and Choices Under the CCPA

**Right to Know.** You have the right to request that we provide certain information to you about our collection of your personal information. Such information shall cover the 12-month period preceding our receipt of your request. Upon our receipt of your verified request, we will provide you with the following:

- The categories of personal information we have collected about you
- The categories of sources from which we have collected your personal information
- Our business or commercial purpose(s) for collecting or selling your personal information
- The categories of third parties with whom we have shared your personal information
- The specific pieces of personal information we have collected about you

You have the right to request that we provide certain information to you about our disclosures and sales of your personal information. Such information shall cover the 12-month period preceding our receipt of your request. Upon our receipt of your verified request, we will provide you with the following:

- The categories of personal information we have collected from you
- The categories of personal information we have sold about you and the categories of third parties to whom we sold such information, by category or categories of personal information for each category of third parties to whom the personal information was sold
- The categories of personal information that we disclosed about you for a business purpose

We have not, and do not, sell personal information. You may only make a verifiable “Right to Know” request twice within a 12-month period.

**Right to Delete.** You have the right at any time to request that we delete your personal information; however, in some cases we cannot delete all or some of your personal information as required or permitted by applicable laws.

**Right to Correct.** You have the right to request that we correct inaccurate personal information we maintain about you. In some cases, however, we may deny requests to correct inaccurate personal information. Alternatively, we may delete such personal information.

**Right to Nondiscrimination.** We will not discriminate against you for exercising your rights under the CCPA, such as by denying you products and services, charging you different rates or prices (including use of discounts or penalties), or suggesting or providing a different level of service or quality of products to you. We may, however, charge a different price or provide a different level or quality of products and services if the price or difference is directly related to the value provided to you by your personal information.

We may, from time to time, offer you financial incentives, including payments to you as compensation, for collecting or deleting your personal information. We also may offer a different price, rate, level, or quality of goods or services if that price or difference is directly related to the value provided to you by your personal information.

**2. Information We Collect and How Long We Retain It.** In the preceding 12 months, we have collected and disclosed to third parties for our business purposes the categories of personal information listed below. For more details about the specific data points we collect, please see the information stated above. In general, we will retain your personal

information for as long as is necessary for the purposes set out above and the business purposes set forth in Section 4, or for longer, specifically:

- As required under any applicable legal, regulatory, accounting, or reporting requirements;
- Based on the agreement you have with us; or
- To resolve disputes or enforce our agreements.

**Please note:** As an investment adviser subject to securities laws and regulations, we are required to maintain records for various time periods pursuant to such laws and regulations, and such records include personal information regarding individuals.

Category of Information	Example
Identifiers	Name, address, Internet Protocol (IP) address, email address, job title, device identifiers, account name, or other similar identifiers
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, postal address, or phone number (Some personal information included in this category may overlap with other categories.)
Characteristics of protected classifications under California law	Gender and age
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, communication (such as email), or advertisement
Commercial information	General investing background, investment interests and experience, information about current firm, and approximate assets under management
Professional or employment-related information	Information about current and past employment
Sensitive personal information	Social security number, driver's license number, financial account numbers, and biometric information (e.g., fingerprints)
Inferences drawn from other professional information	Inference drawn from the information above and profiles reflecting preferences and characteristics

**3. Our Sources for Personal Information.** We collect personal information from you when you provide it to us, when you use our services, and when you interact with us. We also automatically collect some information when you visit our site and may collect information from public record sources, such as federal, state, or local governments.

**4. Our Business Purposes for Collecting Personal Information.** In general, we collect information and personal information so we can provide our services, operate our business, and provide information that consumers request from us. This includes, but is not limited to, the following:

- Provide information, products, or services you request
- Verify your identity when accessing our services
- Compare information for accuracy and verify our records
- Detect and prevent fraud, security or technical issues, or criminal activities
- Operate, improve, maintain, and protect our services
- Provide technical and other support
- Send updates, marketing communications, and other information about us, our representatives, and services
- Send you notices and alerts
- Conduct research, analytics, and monitor and analyze trends and usage
- Contact you and respond to your inquiries
- Send you email newsletters
- Register you for an account in our online services
- Enhance or improve user experience, our business, and our services, including the safety and security thereof

- Personalize our services to you
- As necessary to comply with any applicable law, regulation, subpoena, legal process, or governmental request
- Enforce contracts, including investigation of potential violations thereof
- Protect against harm to the rights, property, or safety of our firm, our users, or the public as required or permitted by law

We do not engage in automated decision-making using your personal information.

**5. Sharing Personal Information.** We may disclose your personal information for the business or commercial purposes set forth in this California Notice or in our privacy policy stated above to the categories of third parties listed as follows:

- Our service providers and subcontractors
- Our affiliates and subsidiaries
- Third parties to whom you authorize us to disclose your personal information
- To comply with a legal requirement, judicial proceeding, court order, or legal process
- To investigate a possible crime, such as fraud or identity theft
- In connection with the sale, purchase, merger, reorganization, liquidation, or dissolution of our firm, or steps taken in anticipation of such events (e.g., due diligence in a transaction)
- When we believe it is necessary to protect the rights, property, or safety of our firm or other persons
- As otherwise required or permitted by law, including any contractual obligations of our firm

We do not use or disclose sensitive personal information, except as set forth in our privacy policy or this California Notice, and as reasonably expected.

**6. Making Requests.** To submit a request to exercise your Right to Know, Right to Delete, or Right to Correct rights provided in this California Notice, please contact us as noted above. Please be prepared to provide your first and last name, your email address, your phone number, your relationship to us, and the type of request. We will evaluate the request and take action where required to do so. Depending on the nature of your request, we may have to verify your identity when you contact us. We may do this by asking you to:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized agent
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm that the personal information relates to you.

We endeavor to respond to your request as soon as we can. If we are not able to respond to your request within 45 days, we will let you know that we may require additional time (up to 90 total days). You may also use an authorized agent to exercise your rights on your behalf. If you wish to use an authorized agent, we require that your authorized agent provide written proof to us that they are authorized to act on your behalf, and we may also require your authorized agent to verify their identity.

**7. Changes to This Notice.** We may change or update this California Notice from time to time. When we do, we will post the revised California Notice.