

# Financial Professional Privacy Notice – California Residents

**Last Modified:** June 1, 2024

Safe Future Financial is committed to protecting your privacy. This Privacy Notice (“Notice”) describes how Safe Future Financial, Safe Future Wealth Partners, and Safe Future Financial Group (collectively, “Safe Future Financial,” also referred to as “we” and “us”) processes personal information in connection with our prospective, current, and former Safe Future Financial agents or producers and Safe Future Wealth Partners investment adviser representatives who are residents of California regarding their professional relationship with us.

The information that we collect is controlled by Safe Future Financial which is located in the United States at 41800 W. 11 Mile Road, STE 201, Novi, MI 48375 and can be reached by mail at this location. This information also may be collected by or transferred to, and therefore controlled by, an affiliate of Safe Future Financial such as Safe Future Wealth Partners, LLC and Safe Future Financial Group.

## **Personal Information We Collect**

We have collected the following categories of information regarding financial advisors in the preceding 12 months:

1. Personal Identifiers – such as your name, alias, date of birth, billing and/or mailing address, unique personal identifier, internet protocol (IP) address, phone number, email address, tax identification number, Central Registration Depository (CRD) Number, National Producer Number (NPN), carrier writing code/agent number, or other similar identifiers.
2. Personal Information – such as your country of birth, state/province of birth, criminal status, and veteran status.
3. Characteristics of Protected Classes – such as gender, citizenship, immigration status, and marital status.
4. Professional or Employment-Related Information – such as your educational history, professional designations, past and present business experience, and/or employment history.
5. Financial Information – such as your bank account number, credit or debit card information, financial account number, and Automated Clearing House (ACH) information.
6. Audio Information – such as call recordings when you connect on a call or leave a voicemail with us.
7. Regulatory Information – such as your hair color, eye color, height, and weight. This information is only used for registration and licensure with regulatory bodies.

8. Technology Information – such as your browser type and version, general geographic location, previously visited websites, computer or device type, internet connection type, user agent string, operating system version, date and time of website visits, time since your last visit, links clicked by you when visiting our sites, and pages you view when visiting our sites.
9. Other Information – such as your residential history, and your written signature for limited purposes like processing or administering policies or other documents regarding your business.
10. Sensitive Personal Information – such as your Social Security number, driver’s license, passport number, and citizenship or immigration status.

Personal Information for the purposes of this notice does not include publicly available information, deidentified or aggregated consumer information, and information collected pursuant to the Gramm-Leach-Bliley Act (“GLBA”). Our privacy policies regarding information collected by Safe Future Wealth Partners, LLC subject to the GLBA can be found in their respective GLBA notices.

### **Sources of Personal Information**

The sources from which we collect personal information depend on, among other things, our relationship or interaction with a specific California resident. The information below lists the categories of sources from which we collect personal information in different contexts.

- From California residents directly, or other individuals acting on their behalf, through, for example, physical (i.e. paper form), electronic (i.e. website), and audible sources (i.e. phone).
- Public records, including information from the media, and other records and information that are made available by federal, state, and local government entities.
- Unaffiliated companies and organizations that provide data to support activities such as fraud prevention, underwriting, and marketing (i.e. internet service providers, social networks, operating systems and platforms, data brokers, advertising networks, and data analytics providers)
- Unaffiliated companies and organizations from whom we collect personal information as part of providing products or services, completing transactions, supporting our everyday operations, and business management (i.e. financial institutions, product carriers, and parties involved with mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets)
- Unaffiliated service providers that collect personal information and collect consent for the sharing of personal information with us.

We may combine the information collected on our websites with information collected from or about you in other contexts. This may include information collected online, such as on our website or through our email exchanges with you, from publicly available sources, or from offline sources, such as when you establish an account with us or call us. If you do not wish to provide information to us, we may be unable to provide certain products or services to you.

### **How We Use Your Information and Our Purpose for Collection Personal Information From You**

The purposes for which we collect, use, and disclose personal information depend on, among other things, our relationship or interaction with a specific California resident. The table below lists the purposes for which we collect, use and disclose personal information in different contexts.

<b>Purpose for Collection, Use and Disclosure</b>	<b>Examples</b>
Provide and manage products and services	<ul style="list-style-type: none"> <li>• Establish and process transactions for our products and services including insurance products, wealth management services, and broker-dealer products</li> <li>• Support the ongoing management and maintenance of our products and services including to provide updates on the status of your transactions, online account access, customer service, payments and collections, and account notifications</li> <li>• Support, operate, and administer our events, conferences, and conventions</li> <li>• To ensure persistent service continuity, such as the use of session cookies to link actions across multiple sessions</li> <li>• To ensure temporary service continuity, such as the use of session cookies to link actions during an online session</li> <li>• Obtain support for fulfilling the above purposes from our third -party service providers, professional services and business partners, and financial institutions</li> </ul>
Support our everyday operations, including to meet risk, legal and compliance requirements	<ul style="list-style-type: none"> <li>• Perform accounting, monitoring, and reporting</li> <li>• Enable information security and anti-fraud operations</li> <li>• Support audits and investigations, legal requests and demands, as well as exercise and defend legal claims</li> <li>• Enable the use of service providers for business purposes</li> <li>• Comply with laws, regulations, policies, procedures, and contractual obligations and to comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, summons, or other legal requests</li> <li>• Obtain support for fulfilling the above purposes from our third -party service providers, professional services and business partners, and financial institutions</li> </ul>
Manage, improve, and develop our business	<ul style="list-style-type: none"> <li>• Market, personalize, develop, and improve our products, services and websites</li> <li>• Conduct research and analysis</li> <li>• Support customer relationship management</li> <li>• Tailor and send you advertising and marketing regarding our products and services, but not for cross-context behavioral advertising</li> <li>• Evaluate and engage in mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets</li> <li>• Obtain support for fulfilling the above purposes from our service providers and from our professional services, business, and marketing partners</li> </ul>

Sensitive Personal Information as permitted by law	<ul style="list-style-type: none"> <li>• Perform services for our business, provide products or services as requested, to register you with state or regulatory authorities as you request, and ensure security and integrity</li> <li>• Process and fulfill orders, maintain and service accounts, provide customer service, verify customer information, process payments and financing</li> <li>• Uses relating to quality and safety control or the improvement of our products and services</li> </ul>
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### Categories of Third Parties and Our Disclosure of Personal Information

The categories of third parties to whom we disclose personal information about a specific individual depend on, among other things, our relationship or interaction with a specific California resident. Such third parties include:

- Outside companies or organizations, including service providers subject to appropriate confidentiality and use restrictions, to whom we disclose personal information as part of providing and managing products and services, supporting our everyday operations, or business management and development;
- Companies or individuals that represent California residents such as an accountant, financial advisor, or person holding power of attorney on behalf of a California resident; and
- Government or regulatory agencies including to support regulatory and legal requirements.

We do not share your personal information with unaffiliated third parties for use in marketing their own products and services.

For each category of personal information we have collected, the table below shows the categories of third parties to whom we disclosed for our business purposes information during the preceding 12 months. While this table only includes brief descriptions of the categories of personal information, full descriptions of the categories and third parties are available above.

Personal Information Types	Third-Party Category to Whom We Disclosed Personal Information for Business Purposes
Personal Identifiers	<ul style="list-style-type: none"> <li>• Outside companies or organizations for the purpose of providing and managing products and services, supporting our everyday operations, or business management and development</li> <li>• Representatives of California residents</li> <li>• Government or regulatory agencies</li> </ul>
Personal Information	<ul style="list-style-type: none"> <li>• Outside companies or organizations for the purpose of providing and managing products and services, supporting our everyday operations, or business management and development</li> <li>• Representatives of California residents</li> <li>• Government or regulatory agencies</li> </ul>
Characteristics of Protected Classes	<ul style="list-style-type: none"> <li>• Outside companies or organizations for the purpose of providing and managing products and services, supporting our everyday operations, or business management and development</li> <li>• Representatives of California residents</li> </ul>

	<ul style="list-style-type: none"> <li>• Government or regulatory agencies</li> </ul>
Professional or Employment-Related Information	<ul style="list-style-type: none"> <li>• Outside companies or organizations for the purpose of providing and managing products and services, supporting our everyday operations, or business management and development</li> <li>• Representatives of California residents</li> <li>• Government or regulatory agencies</li> </ul>
Financial Information	<ul style="list-style-type: none"> <li>• Outside companies or organizations for the purpose of providing and managing products and services, supporting our everyday operations, or business management and development</li> <li>• Representatives of California residents</li> <li>• Government or regulatory agencies</li> </ul>
Regulatory Information	<ul style="list-style-type: none"> <li>• Outside companies or organizations for the purpose of providing and managing products and services, supporting our everyday operations, or business management and development</li> <li>• Representatives of California residents</li> <li>• Government or regulatory agencies</li> </ul>
Technology Information	<ul style="list-style-type: none"> <li>• Outside companies or organizations for the purpose of providing and managing products and services, supporting our everyday operations, or business management and development</li> <li>• Representatives of California residents</li> <li>• Government or regulatory agencies</li> </ul>
Other Information	<ul style="list-style-type: none"> <li>• Outside companies or organizations for the purpose of providing and managing products and services, supporting our everyday operations, or business management and development</li> <li>• Representatives of California residents</li> <li>• Government or regulatory agencies</li> </ul>
Sensitive Personal Information	<ul style="list-style-type: none"> <li>• Outside companies or organizations for the purpose of providing and managing products and services, supporting our everyday operations, or business management and development</li> <li>• Representatives of California residents</li> <li>• Government or regulatory agencies</li> </ul>

## Cookies and Web Beacons

We use a variety of online technologies, such as cookies, web beacons, and similar mechanisms, as described further below, to collect information that helps us understand how our websites are used. Specifically, Safe Future Financial or our service providers may automatically collect a variety of technical and navigational information about you via these technologies, as described above.

We may also use similar tracking technologies in emails that we or our service providers send to you. This information may be used, for example, to alert you to software compatibility issues, to resolve technical or service problems, and for security purposes. We also

analyze this information, with the assistance of our service providers, to improve our website design and functionality, to enhance our ability to serve you and your accounts, and to tailor our communications to you regarding our products and services.

**Cookies:** A cookie is a small file of letters and numbers that is stored on your computer or other device when you visit a website. Cookies contain information that is transferred to or read on your device and allow websites to recognize devices and store certain information, such as user preferences. Cookies are used to distinguish you from other users of our online services. This helps us to provide you with a useful experience when you browse and also allows us to improve our online services. We and our service providers use session cookies, which link your actions during a particular online session and expire at the end of that session, as well as persistent cookies, which remain on your device and allow us to remember your actions or preferences across multiple browser sessions.

If you are concerned about having cookies on your computer or other device, you can set your browser to refuse all cookies or to indicate when a cookie is being set, allowing you to decide whether to accept it. You can also delete cookies from your device. The help feature on most web browsers will inform you how to prevent your browser from accepting new cookies, how to receive notice when a new cookie is being set, and how to disable cookies altogether. However, if you chose to block or delete cookies, certain features on our websites may not operate correctly.

For further information about deleting or blocking cookies, please visit [allaboutcookies.org/how-to-manage-cookies](http://allaboutcookies.org/how-to-manage-cookies).

**Web Beacons:** Our websites and the emails that you receive from Safe Future Financial use an application known as a web beacon (also known as a pixel tag or clear gif). A web beacon is an electronic file that usually consists of a single-pixel image, embedded in a web page or an email to measure usage and activity. In some cases, a web beacon triggers the placement of a persistent cookie on your device.

Our websites offer customized features that require our use of cookies and web beacons. Certain sections of our websites require cookies to be enabled to support site or application performance and provide enhanced authentication. For example, cookies enable us to personalize and improve your user experience and help enhance navigation. Cookies also help us to understand how people use our online services so that we can improve their structure, functionality, and content. Web beacons allow us, directly or through our service providers, to collect information used for website analytics, such as how many users have visited particular pages or downloaded documents, or how frequently users search for a particular term. However, our use of these cookies and web beacons is limited. We do not view or collect data in cookies or similar data files created by other websites. We will not share the information in these data files or give others access to it – except to help us better serve your needs and as described in this privacy policy.

**Emails:** We and our service providers use web beacons and cookies to determine whether and when you receive or open our emails. These beacons and cookies may also capture information about the type of device, operating system, email program, and web browser used to view the email, the IP address from which you opened the email, and whether you click any links in the email. These beacons and cookies are utilized to gauge the effectiveness, relevance, and value of our email communications, as well as to target relevant advertising to you and to measure the impact of the advertising on your Safe Future Financial relationship.

## **How We Safeguard Your Information**

We are committed to maintaining the security of your personal information. We use administrative, technical, and physical security measures designed to safeguard your information against loss, theft, unauthorized use, disclosure, or modification. We also take measures to ensure service providers that process personal information on our behalf also have appropriate security controls in place. Please note that regardless of security measures, no system is completely infallible. While we strive to safeguard your information, we cannot guarantee that unauthorized access, hacking, data loss, or a data breach will never occur.

### **Selling and Sharing of Personal Information**

Safe Future Financial does not sell the personal information of California residents. Safe Future Financial has not sold the personal information of California residents during the last twelve (12) months. The California Consumer Privacy Act ("CCPA") defines "sell" and "sold" as the disclosure of personal data for monetary or other valuable consideration.

Safe Future Financial does share personal information with third parties for the purpose of cross-context behavioral advertising. Safe Future Financial has shared personal information with a third-party for this purpose during the last twelve (12) months.

The CCPA defines "share" as the disclosure of personal information by a business to a third party for cross-context behavioral advertising whether or not for monetary or other valuable consideration, including transactions between a business and a third party for such advertising for the business' benefit where no money is exchanged. The CCPA further defines "cross-context behavioral advertising" as targeting advertising to a consumer based on the consumer's personal information obtained from their activity across businesses, distinctly branded websites, applications, or services, other than those with which the consumer intentionally interacts. We engage a service provider to analyze, audit, research, and report on the cookies and web beacons utilized above. In particular, our websites use Google Analytics to help collect and analyze certain information for the purposes discussed above. Google Analytics is a web analytics service offered by Google, Inc. that tracks and reports website traffic. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of sharing your activity to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about your activity. For more information on the privacy practices of Google, please visit the Google Privacy web page at <https://policies.google.com/privacy>.

You may also opt-out of this sharing by exercising your rights as outlined below. Safe Future Financial does not knowingly share the personal information of consumers under 18 years of age.

### **Your Privacy Rights**

California provides California Consumers with certain data rights with respect to the personal information covered by the CCPA that businesses collect. You may exercise any of the listed data rights (subject to certain exceptions and limitations), by notifying us via email or postal mail.

You have a right to know:

- The specific pieces of personal information we have collected about you;
- The categories of personal information we have collected about you;

- The categories of sources from which your personal information is collected;
- The categories of personal information that we have disclosed for a business purpose about you;
- The categories of third parties to whom personal information was disclosed for a business purpose; and
- The business or commercial purpose for collecting personal information.

You also have the right to “Request to Delete” your personal information. You may request that we delete personal information about you that we have collected from you (unless an exception applies or deletion is otherwise restricted or prohibited by law, rule, or regulation.)

You also have the right to request the correction of inaccurate personal information that we may have. You also have the right to limit the use of your sensitive personal information in certain situations. You also have the right to opt out of sharing for targeted or cross-context behavioral advertising purposes.

Safe Future Financial does not discriminate against any California Consumer for exercising their rights. We do not disclose your personal information to third parties for the third parties’ direct marketing purposes unless you affirmatively agree to it. We do not use automated decision-making involving personal information at Safe Future Financial.

### **Authorized Agents**

If you want to make a request as an authorized agent on behalf of a California resident, you may use the submission methods noted above. As part of our verification process, we may request that you provide, as applicable:

- Proof of your registration with the California Secretary of State to conduct business in California;
- A power of attorney from the California resident pursuant to Probate Code sections 4000-4465;
- Written permission that the California resident has authorized you to make a request on the resident’s behalf. This permission must be signed (via physical or e-signature) by the California resident.

If you are making a request on behalf of a California resident and have not provided us with a power of attorney from the resident pursuant to Probate Code sections 4000-4465, we may also require the resident to:

- Provide you with written permission signed by the resident to make the request on the resident’s behalf;
- Verify the resident’s own identity directly with us;
- Directly confirm with us that the resident provided you permission to submit the request.

### **Instructions for Exercising Your California Rights**

You may notify us of your intent to exercise your rights, or to exercise another’s rights as an authorized agent, by (1) Sending an email to [info@safefuturefinancial.com](mailto:info@safefuturefinancial.com) or, (2) by mailing a request to our home office:

Safe Future Financial

Attn: Operations

41800 W. 11 Mile Road, STE 201

Novi, MI 48375

You may also call us toll-free at (833) 422-8010.

Once we receive your request, we will initiate a verification process to confirm your identity. We may ask you to provide additional information to verify your identity for security or fraud-prevention purposes. In cases where additional information is required and we are unable to contact you with the contact information you have provided or are otherwise unable to sufficiently verify your identity, we may be unable to respond to your request.

### **Sensitive Personal Information**

Safe Future Financial only uses and discloses sensitive personal information for the purposes in CPRA Section 7027 and without inferring characteristics about you. Safe Future Financial will not use or disclose your sensitive personal outside of these purposes unless we obtain your consent.

### **Data Retention**

We retain personal information for a period that is reasonably necessary and proportionate to achieve the purpose and with considerations of certain criteria, such as:

- Providing services or products to you as part of a standing agreement you have with us;
- Making data-driven business decisions;
- Complying with our legal obligations, such as retention periods required by law, regulation, or professional standards; and
- Resolving disputes and establishing, exercising, or defending our legal rights or the right of employees, agents, and/or financial professionals.

### **What You Can Do**

For your protection, you should not provide your Safe Future Financial account or login information, username, or password to anyone. If you become aware of any suspicious activity relating to your account or information, it is your responsibility to contact us immediately at [info@safefuturefinancial.com](mailto:info@safefuturefinancial.com).

### **Updates or Amendments to this Notice**

We recognize that data privacy is an ongoing responsibility of Safe Future Financial. We reserve the right to update or amend this Notice from time to time and any such updates or amendments will be reflected in the Notice available on our website.

### **Contact Information**

To ask questions or raise a concern about this privacy notice and our privacy practices, contact us at [info@safefuturefinancial.com](mailto:info@safefuturefinancial.com).