

Privacy Policy

Below is the Adviser's Privacy Policy regarding client personal information.

The Adviser:

- a) Collects non-public personal information about its clients from the following sources:
 - Information received from clients on applications or other forms;
 - Information about clients' transactions with the Adviser, its affiliates, and others;
 - Information received from our correspondent clearing broker with respect to client accounts;
 - Medical information submitted as part of an insurance application for a traditional life or variable life policy; and
 - Information received from service bureaus or other third parties.
- b) The Adviser will not share such information with any affiliated or nonaffiliated third party except:
 - When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians;
 - When required to maintain or service a customer account;
 - To resolve customer disputes or inquiries;
 - With persons acting in a fiduciary or representative capacity on behalf of the customer;
 - With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants, and auditors of the firm;
 - In connection with a sale or merger of the Adviser's business;
 - To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims, or other liability;
 - To comply with federal, state, or local laws, rules, and other applicable legal requirements;
 - In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
 - In any circumstances with the customer's instruction or consent.
- c) Restricts access to confidential client information to individuals who are authorized to have access to confidential client information and need to know that information to provide services to clients.
- d) Maintains physical, electronic, and procedural security measures that comply with applicable state and federal regulations to safeguard confidential client information.

Your California Privacy Rights – The California Consumer Privacy Act (“CCPA”) provides California residents with rights to receive certain disclosures regarding the collection, use, and sharing of “Personal Information,” as well as rights to know/access, delete, and limit sharing of Personal Information. The CCPA defines “Personal Information” to mean “information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.” As a financial services organization, much of the information we collect is exempt from the CCPA because it is covered by federal or state financial privacy laws, such as the Gramm–Leach–Bliley Act and the Fair Credit Reporting Act. In addition, some information we collect may be exempt because it is considered public information (i.e., it is made available by a government entity) or because it is subject to other federal privacy laws, such as the Health Insurance Portability and Accountability Act. To the extent that we collect Personal Information that is subject to the CCPA, your rights as a California resident to request access and deletion of that information are described below.

We do not sell your Personal Information to third parties. However, as described in this policy, we do allow third parties and service providers to collect Personal Information through the Services and share information with third parties and service providers for business purposes.

Right to Know/Access Information – You have the right to request access to Personal Information collected about you and information regarding the source of that information, the purposes for which we collect it, the categories of third parties with whom we share it, and the specific pieces of Personal Information we have collected about you. To protect our customers’ Personal Information, we are required to verify your identity before we can act on your request to know/access information.

If you have authorized someone else to make requests on your behalf, we require that you provide additional documentation, as described below.

Right to Request Deletion of Information – You have the right to request in certain circumstances that we delete any Personal Information that we have collected directly from you. To protect our customers’ Personal Information, we are required to verify your identity before we can act on your request to delete information. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated.

How to Submit a Request – You may submit a request to exercise your California privacy rights through any one of these means:

- (1) By filling out a Consumer Data Request Form which may be requested by emailing compliance@integratedadvisorsnetwork.com
- (2) By calling us at: **855.729.4222**.

Verification Procedures – In order to process your request to know about or delete personal information we collect, disclose, or sell, we must verify your request. We do this by requesting that you provide personal identifiers, such as your name, phone number, and e-mail, that we can match against information we may have collected from you previously. We may also request you to confirm your request using the email or telephone account stated in the request.

Requests by Authorized Agent – You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf. We require that you provide legal documentation confirming the identity and authority of an authorized agent to act on your behalf. Such documentation may include, but is not limited to, a power of attorney, conservatorship or guardianship documentation, letters testamentary, or notarized statements (as may be appropriate under the circumstances). Parents of minor children may be required to submit a birth certificate of the child, to make requests on the child’s behalf.

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