

Selective Wealth Management, Inc.

Privacy Policy

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Date Created: February 26, 2013
Date Last Revised: February 21, 2025



Purpose

Selective Wealth Management (“Selective” or the “Advisor”) 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 Advisor as described here in our Privacy Policy (“Policy”).

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. Selective (also referred to as "we," "our," and "us") 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.

Selective does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discreet 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 Policy.

Why do you need to know?

Registered Investment Advisors (“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.

How does Selective collect personal information?

Selective collects personal information from the following sources:

- Investment advisory agreements, account applications, and other documents in connection with the maintenance of financial accounts.
- Information provided through oral and electronic communications.
- Information received from third parties, such as brokerage firms, about transactions and accounts.

What information do we collect from you?

Driver’s license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address, and phone number(s)	Income and expenses
Email address(es)	Investment activity
Account information	Investment experience and goals



What information do we collect from other sources?

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

How do we protect your information?

Selective has established its Chief Compliance Officer (CCO) as coordinator of established safeguards. The CCO will be responsible for ensuring that employees have been educated on company policy and adhere to established guidelines.

The CCO will be responsible for monitoring the effectiveness of the established safeguards. At least annually the CCO will be required to investigate the usefulness of Selective’s privacy policies and procedures.

Selective has established multiple avenues of protection to provide the best safeguards possible given the environment. Employees are only given access to files they need, limiting the amount of client information that is exposed. Computers are secured with passwords and antivirus to protect from cyber-attacks, and any physical files are stored within offices behind lock and key. The Selective offices are secured with dead-bolt locks and additional locking points throughout the building, including a security guard and cameras. Third party vendors are required to protect personal information they receive from us in the course of servicing your account.

How do we share your 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, and 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.	Yes	No
Marketing Purposes Selective does not disclose and does not intend to disclose personal information with non-affiliated third parties to offer you services. We may use client data to ensure current clients do not receive marketing from Selective (“exclusion lists”). Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Selective or the Client has a formal agreement with the financial institution. We will only share	No	Not Shared



information for the purposes of servicing your accounts, not for marketing purposes.		
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 Selective does not disclose and does not intend to disclose nonpublic personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

COMPROMISED SECURITY

In the event client information is compromised Selective has outlined steps to isolate and address the issue. Below are the series of steps that will be taken if a situation ever arises:

- Monitor, limit, or temporarily suspend activity in the account until situation is resolved.
- Alert the CCO and others in the firm to see if anyone else is reporting an issue.
- Identify, if possible, the root of intrusion.
- Contact SEC and respective FINRA Coordinator.
 - <http://www.sec.gov/contact/addresses.htm>
 - <http://www.finra.org/Industry/Contacts/P016038>
- If appropriate, Selective will contact law enforcement agencies.
- Contact relevant state authorities.
- Contact the compromised client.
- Determine whether a Suspicious Activity Report (SAR) is required to be filed.

Modifications to Policy

If necessary, the CCO will make modifications to this policy and ensure that employees are updated accordingly.