

## Selective Wealth Management, Inc.

### Privacy Policy

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## 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.
- Recordings and transcripts of virtual meetings (AI Notetakers)



## What information do we collect?

Identity & Contact	Name, address, phone numbers, email, SSN/TIN, date of birth, driver's license number.
Financial & Professional	Assets, liabilities, income, expenses, investment activity, investment goals, current employer, and job title.
Digital Identifiers	IP addresses, cookie identifiers, and website usage data (when you visit our website or portal).
Audio/Visual Data	Recordings and transcripts of client meetings and phone calls used for recordkeeping and service accuracy.

## How is information used?

We use your information to:

- Manage and service your accounts and process transactions.
- Communicate with you regarding your financial plan and investments.
- Analyze and summarize client meetings using artificial intelligence service providers.
- Develop and deliver targeted marketing exclusion lists on digital platforms (to keep current clients from receiving redundant advertisements).
- Comply with legal and regulatory requirements.

## Information Sharing with Third Parties

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> 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
<b>Marketing Purposes</b> To create social media exclusion lists.	Yes	Yes
<b>Authorized Users</b> 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



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

## 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.

- **Technical Safeguards:** We require Multi-Factor Authentication (MFA) for all staff accessing core systems. Data is encrypted both at rest and during transit.
- **Employee Oversight:** Employees undergo periodic training and participate in simulated phishing exercises.
- **Vendor Due Diligence:** We perform reviews of all vendors at least annually

## Use of Innovative Technologies (AI)

Selective utilizes third-party tools, including artificial intelligence (AI) and automated transcription services (Notetakers) to record and summarize client communications. We provide notification at the start of recorded sessions and/or as an acknowledgement on meeting invitations. We have configured AI tools to ensure that client data is not used by the provider to train their global models, maintaining the strict confidentiality of your information.

## Data Retention

We retain client information for as long as necessary to provide our services and to comply with legal requirements, such as the 5-6 year recordkeeping rules under the Investment Advisers Act. While digital records may be stored for longer periods for continuity, we employ secure deletion methods and professional shredding for all data that is no longer required.

## Important Information for Residents of Certain States

- **California:** You have the right to request access to, deletion of, or correction of your personal information. You may also opt-out of the "sharing" of your email for marketing exclusion lists.
- **Virginia:** You have the right to confirm processing, correct inaccuracies, and delete personal data.
- **Vermont:** We will not share information about Vermont residents with non-affiliated third parties (except for servicing) unless you explicitly authorize us to do so.



- **Nevada:** You may be placed on our internal Do Not Call list by contacting us at the email below.
- **Massachusetts:** We maintain a formal Written Information Security Program (WISP) in accordance with state law.

To exercise any of these rights, contact us at [info@selectivewm.com](mailto:info@selectivewm.com)

## 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.

## Notification of Changes & Delivery

We provide this policy at the start of our relationship and annually thereafter. Updates are delivered as the "top document" in your monthly account statements, accessible via the eMoney client portal or delivered via U.S. mail based on your preference.

## Modifications to Policy

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