



## PRIVACY NOTICE

Revised 04.29.26

**Our Commitment to Privacy:** Smart Steps Wealth Management has adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information. For any questions or concerns regarding your privacy, please contact us at Smart Steps Wealth Management at 314.970.2377.

**What Information We Collect:** We collect certain nonpublic personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.). We collect information about your visits to our website. We store records of the activities on our sites in our web server logs, which automatically capture and save the information electronically. The information we collect helps us administer the site, analyze its usage, protect the website and its content from inappropriate use, and improve the user's experience. We also collect your phone number and consent status to provide you with SMS services. This information is used solely for the purpose of delivering text messages related to the campaign you have opted into. You have the right to access, correct, or delete your personal information.

**How We Use Information:** Information may be used among companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants, and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts/non-public information** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you and/or SSWM;
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;
- **To keep you informed** about financial services of interest to you.

**What Information We Disclose:** We may only disclose information that we collect in accordance with this policy. SSWM does not sell customer lists and will not sell your name to telemarketers. SSWM does not sell, share, or disclose your nonpublic personal information to non-affiliated third-party financial companies. SSWM will not share your nonpublic information with non-affiliated third parties. SMS consent and phone numbers collected for SMS communication purposes will not be shared with any third party or affiliates for marketing purposes.

We are permitted by law to disclose the nonpublic personal information about you to certain third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs), however **we will not do so**. These third parties are prohibited to use or share the information for any other purpose.

**Categories of Parties to Whom We Disclose:** We will not disclose the nonpublic personal information we collect about our customers to anyone except as necessary as follows:

- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company, other investment advisers;
- To comply with broker-dealer firms that have regulatory requirements to supervise certain representatives' activities;
- To persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.);
- To third parties who perform services or marketing, client resource management, or other parties to help manage your account on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants, or auditors; and
- To government entities or other third parties in response to subpoenas or other legal processes as required by law or to comply with regulatory inquiries.
- And other persons or entities that you provide express written consent to share your information with.

**Regulation S-AM:** Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. SSWM does not receive information regarding marketing eligibility from affiliates to make solicitations.

**Our Security Policy:** We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

**Cyber Security:** Internal policies and procedures are in place to address cyber security. A copy of this policy is available upon request.

**Succession Planning:** In the event that the owner(s) of SSWM retire, become incapacitated, or perish unexpectedly, your information would be disclosed to an unaffiliated third party for the purposes of facilitating a business succession plan. A change in control of ownership of SSWM would require your consent, as dictated by your signed agreement with SSWM, in order to continue providing services to you.

**Closed or Inactive Accounts:** If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

**Complaint Notification:** Please direct complaints to: Joseph Darpel III at Smart Steps Wealth Management, LLC, 3636 S. Geyer Rd. Suite 100 St. Louis, Missouri 63127; 314-970-2377.

**Changes to This Privacy Policy:** If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Smart Steps Wealth Management, LLC, 3636 S. Geyer Rd. Suite 100 St. Louis, Missouri 63127; 314-970-2377.