



## The Mather Group, LLC Privacy Notice

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of The Mather Group, LLC (TMG).

### Information We Collect

In connection with providing investment services, financial advice, or other services, we obtain non-public personal information about you. The Gramm-Leach-Bliley Act applies to this category of personal information, which is any information that you provide to TMG to obtain a financial product or service or information resulting from any transaction involving a financial product or service between TMG and you, or that we otherwise obtain about you in connection with providing a financial product or service to you (“personally identifiable financial information”). Personally identifiable financial information can include, but is not limited to:

- Information we receive from you on account applications, such as your address, date of birth, social security number, occupation, financial goals, assets, and income and credit history.
- Information about your account balances and transactions.

### Purpose of Personal Information Processing

In connection with providing investment services, financial advice, or other services, we may use non-public personal information about you:

- To evaluate opening an account or when entering into a relationship with you at your request.
- To deliver services you have requested.
- To manage payments, fees, charges, transfer funds, and collect or recover outstanding debt.
- To manage our relationship with you.
- To send you marketing communications, regulatory disclosures, and service updates via paper and electronic channels.

### Categories of Information We Disclose

We may only disclose information that we collect in accordance with this policy. TMG does not sell customer lists and will not sell your name to telemarketers. TMG does not receive information regarding marketing eligibility from affiliates to make solicitations.

### Categories of Parties to Whom We Disclose

We will not disclose information regarding you or your account with us, except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, insurance company, law or tax firms.
- To consumer reporting agencies as required by the Fair Credit Reporting Act.
- To third parties who perform services or marketing on our behalf as required by the Gramm-Leach-Bliley Act.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of TMG's assets, whether as a going concern or as part of

bankruptcy, liquidation, or similar proceeding, in which personal information held by TMG is among the assets or business operations transferred.

- To your attorney, trustee, or anyone else who represents you in a fiduciary capacity, including accountants or accounting firms.
- To our attorneys, accountants, or auditors.
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

### **Closed or Inactive Accounts**

If you decide to close your account(s) or become an inactive customer, we will continue to adhere to the policies and practices described in this policy statement.

### **Opting Out of Information Sharing**

Federal and state laws give you the right to limit some but not all marketing from us as well as the information we share. Federal and state laws also require us to give you this notice to tell you about your choice to limit marketing from us as well as the information we share. You may limit us and our own subsidiaries, such as our insurance and securities affiliates, from marketing their products or services to you based on your personal information that they receive from us or from sharing your information.

### **State Law Privacy Obligations**

State laws such as the California Consumer Privacy Act (“CCPA”) do not apply to personally identifiable financial information we collect in connection with our client relationship, which is governed under privacy laws such as Gramm-Leach-Bliley and Fair Credit Reporting Acts. What TMG does with personally identifiable financial information of our clients, as governed by the Gramm-Leach-Bliley Act or Fair Credit Reporting Act, is also set forth in our federally required disclosures. Depending on whether you have or had a client or other business relationship with us, including any potential, current, or former employment relationship, some state law privacy requirements may not apply to you or all of your personal information. For personal information that is not personally identifiable financial information, some state law privacy requirements apply including without limitation the following:

#### **California Residents**

In accordance with California law, we do not sell your information, nor do we share your information with non-affiliates. We will not share information we collect about you except as permitted by this Privacy Notice or California law. Per the CCPA, you have the right to: access your personal information that is collected, request that we delete your personal information pursuant to this act, request information about how your information is shared and what it is used for, know with what third parties your information is shared, and opt-out of the sharing of your personal information.

#### **Nevada Residents**

Under Nevada law, you may request, in writing, to be placed on our internal “Do Not Call” list. Nevada law requires that we also provide you with the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; Phone Number (702) 486-3132; email: [BCPINFO@ag.state.nv.us](mailto:BCPINFO@ag.state.nv.us).

#### **Oregon Residents**

We will not share your personal information or browsing information with nonaffiliated third parties for marketing purposes, except after you have been informed by us of such sharing and had an opportunity to indicate that you do not want a disclosure made for marketing purposes.

### **Vermont Residents**

We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

### **Virginia Residents**

Virginia residents may submit requests to confirm whether TMG is processing your personal data and to have access to such data; to correct inaccuracies; to delete personal data; to obtain a copy of personal data; and to opt-out the processing of personal data or purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer.

To exercise any of these rights please contact us at: The Mather Group, LLC, 353 N. Clark Street, Suite 2775, Chicago, IL 60654, (888) 537-1080.

### **International Users**

TMG's services are currently designed for use only in the United States of America. If you are using our services from a jurisdiction other than the United States of America, levels and/or standards for data protection may not be equivalent to those in your home jurisdiction. By providing us with your personal information, you consent to our use of it in accordance with TMG's Privacy Notice, including the transfer of your information across international boundaries to jurisdictions anywhere in the world as permitted by law.

### **Regulation S-ID**

Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to clients or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect to prevent and mitigate identity theft.

### **Information Security**

TMG restricts access to non-public personal information to those employees who need to know that said information in order to provide our products and services to you. We maintain physical, electronic, and procedural safeguards to protect your non-public personal information.

### **Website, Cookies and Third-Party Website Links**

Information collected from your web browser may allow TMG's website to recognize your web browser and personalize the user experience and enhance navigation of the site (commonly referred to as "cookies"). You can change your cookie preferences by changing the settings on your web browser to delete or reject these cookies, however it may cause some website pages to not function properly.

TMG's website contains links that are maintained or controlled by third parties, each of which has a privacy policy. Please read the privacy policies of such third parties and understand that accessing their websites is at your own risk.

### **Complaint Notification**

Please direct complaints to our compliance team, at The Mather Group, LLC, 353 N. Clark Street, Suite 2775, Chicago, IL 60654, [tmgcompliance@themathergroup.com](mailto:tmgcompliance@themathergroup.com).

We reserve the right to amend this Privacy Notice as needed. The revised Privacy Notice will be posted on our website and/or otherwise provided to you. 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 Notice, please contact us at: The Mather Group, LLC, 353 N. Clark Street, Suite 2775, Chicago, IL 60654, (888) 537-1080.