

## **PRIVACY NOTICE**

We value the trust our clients and prospective clients have placed in us and are committed to the responsible management, use, and protection of your personal information. This Privacy Notice will outline how we protect your information and use it to service your account(s). This notice is provided to you by RTD Financial Advisors, Inc. ("RTD").

### **Our Privacy Principles:**

RTD adheres to the following privacy principles:

- We do not sell client information;
- We do not provide client information to persons or entities outside of RTD who are doing business for their own marketing purposes; and
- We afford prospective clients and former clients the same protections as existing clients with regard to the use of personal information.

### **Information We Collect:**

RTD collects personal information about our clients to help us serve your financial needs, process transactions in your accounts, provide customer service, and fulfill legal and regulatory requirements. RTD collects information about our clients from the following sources:

- Information provided to us by you (through applications, forms, or discussions);
- Information about your transactions with us or others; and
- Information from other third parties (employers, associations, other institutions, etc.).

You may contact us at any time to review or update the personal information we maintain about you.

### **Information We Disclose:**

For purposes of this Notice, "nonpublic personal information" includes information you provide to us, information generated in the course of providing advisory services, and information obtained from third parties about your financial circumstances, transactions, or account history.

We may not disclose your nonpublic personal information without your prior consent, unless the disclosure falls under the following circumstances:

- To your other professional advisors, only with your authorization;
- To provide services requested by you (i.e. account maintenance and providing statements);
- To establish or maintain an account with an unaffiliated third party, such as a clearing broker providing services to you and/or RTD;
- To other third parties RTD utilizes to maintain our business;
- To other third parties RTD utilizes to provide services on your behalf; and
- To government entities or other third parties in response to subpoenas or other legal processes as required by law.

When we share personal information with service providers, we do so under agreements permitted by law requiring them to protect the confidentiality and security of your information and to notify us of any security incidents so that we can comply with regulatory obligations.

### **Our Security Policy:**

Confidential client information is limited to those individuals who need it to perform their jobs. We maintain physical, electronic, and procedural security measures that comply with applicable state and federal regulations to safeguard confidential client information. These measures include secure office facilities, password-protected systems, encryption, access controls, and employee confidentiality obligations. Keeping your information secure is of the highest priority for RTD.

### **Incident Response and Data Breach Notification:**

RTD maintains a written incident response program designed to detect, respond to, mitigate, and recover from any unauthorized access to client information. If we determine that unauthorized access to or use of your sensitive personal information has occurred or is reasonably likely to have occurred, we will provide you with notice as required by applicable law and SEC Regulation S-P, generally within 30 days of that determination.

For purposes of this section, “sensitive personal information” includes information that can be used to access your account or that could result in substantial harm or inconvenience if disclosed, such as Social Security numbers, account numbers, identification numbers, or login credentials.

**Closed or Inactive Accounts:**

This notice extends to all clients with closed or inactive accounts. RTD will always secure private data even after a relationship is terminated. RTD retains client information only for as long as necessary to provide services, comply with legal and regulatory requirements, and maintain required records. When information is no longer required, RTD securely disposes of it in accordance with our written data retention and destruction policy.

**Changes to Privacy Policy:**

If we make any substantial changes in the way we use or disseminate confidential information, we will notify you.

**Questions:**

If you have any questions concerning this Privacy Policy, please feel free to contact us at (215) 557-3800.