

# AVITAS WEALTH MANAGEMENT ONLINE PRIVACY POLICY

**Effective Date: March 5, 2018**

Welcome! Thank you for visiting Avitas Wealth Management, LLC (“Avitas,” “we” or “us”) and reviewing our online privacy policy. To help inform you, we provide this notice explaining our online information practices and the choices you can make about the collection and use of information you submit or we collect through our website [avitaswealth.com](http://avitaswealth.com) (the “Site”). The Site is owned and operated by Avitas.

In compliance with the Privacy of Consumer Financial Information Rule of the Gramm-Leach-Bliley Act (“GLBA”) governing financial institutions, you can also review our GLBA compliant “Privacy Policy Notice” at [Privacy Policy Notice](#).

## 1. Scope and Consent

When you use the Site, you are contracting with Avitas. For residents outside of the United States, in compliance with European Union regulations Avitas is to be considered your data controller. By using the Site, you expressly consent to our collection, use, disclosure, and retention of your personal information as described in this Privacy Policy.

## 2. Information We Collect

**(a) Information to Respond to Your Requests:** You may give us your personal information such as your name, phone number and email so we can respond to your requests, e.g., when you send us questions about our advisory services, or sign up for newsletters and other communications. Details on how you can opt-out of receiving communications from us are described in Section 4 (Your Choices) below.

**(b) Information From Other Sources:** If you create an account with us, in compliance with applicable laws the information we collect may be combined with information from the records of third parties. For example, we may provide a portal that connects you to your financial accounts with Charles Schwab, and we may aggregate data from those accounts in our portal to allow us to analyze your asset balances and performance.

**(c) Account Registration:** If you create an account with us, we will collect, the username and password you use to login and manage your account. If you connect other financial accounts to your portal on the Site, we may have access to the account information for those accounts.

**(d) Content You Submit on the Site:** Our Site may have a document vault where you can upload financial documents for our review, e.g., to process transactions or new accounts. The documents you submit may provide additional personal information to us, including, but not limited to, financial information,

driver's license, and social security number. Such documents may provide us similar information about other members of your family.

**(e) Mobile Information:** We may collect additional information from you if you access our Site through a mobile device, particularly technical usage information.

**(f) Technical Usage Information:** When you visit our Site, we collect usage information sent to us by your computer, mobile, or other access device that tells us how you are using the Site ("usage information"). We may use tracking technologies (including cookies, web beacons, clear gifs, embedded scripts, e-tags) to collect usage information.

We may also collect computer and/or connection information. During some visits we may use software tools to measure and collect session information, including page response times, download errors, time spent on certain pages and page interaction information.

Our goal is to collect and use only that information that we think is required for our legitimate business interests, in order to better understand your interests and improve your experience using the Site. To learn more about how we use tracking technologies and cookies, see Section 7 of this Privacy Policy (Tracking Technologies (Cookies)).

### **3. Uses and Retention**

**(a) Operate Our Site:** We use the information collected to (i) manage your accounts with us; (ii) respond to your requests, inquiries and comments; (iii) develop, maintain, improve, support and customize the Site and our services; and (iv) comply with your stated communication preferences.

**(b) Analyze and Aggregate Non-Personal Information:** We use aggregate information about our users and non-personal information to analyze the Site and user behavior and prepare aggregated reports.

**(c) Prevent Fraud:** We use information from the Site to prevent, detect, and investigate fraud, security breaches, and potentially prohibited or illegal activities.

**(d) Communicate With You:** We use your information to (i) contact you regarding your request for information; (ii) discuss your accounts; and (iii) to contact you for other purposes authorized by law.

**(e) Mobile Data:** When you access the Site on a mobile device, we may use the information collected for any purpose set forth in this Privacy Policy.

**(f) Other Uses:** We may use the information for marketing and investment analysis, and to make decisions about our business.

We retain information as long as it is necessary and relevant for our operations.

#### 4. Your Choices

You can control how and when you want to receive notifications from Avitas by following instructions within notices or by contacting us via email at [privacy@avitaswealth.com](mailto:privacy@avitaswealth.com). For more information about how to opt-out of marketing emails go to Section 6 (Communication Preferences and Marketing (Opt-out)), and for information about how to change or update your personal information go to Section 8 (Accessing, Reviewing, and Changing Your Personal Information).

#### 5. Disclosure

Information collected on the Site may be shared with:

(a) **Service Providers:** We may disclose your information to service providers under contract who help with our operations (such as, but not limited to, developing, maintaining, improving and supporting our Site and financial advisory services, marketing, site analytics and operations, and fraud investigations).

(b) **Third Parties:** We may disclose your information to banks and other financial services to connect and manage your various accounts on our Site. We may also disclose your information to third party auditing firms.

(c) **Other Persons with Your Consent:** Other third parties to whom you explicitly ask us to share your information.

(d) **Legal and Law Enforcement:** Law enforcement, governmental agencies, or authorized third parties, in response to a verified request relating to a criminal investigation or alleged illegal activity or any other activity that may expose us, you, or any other Avitas customer to legal liability. In such events, we will only disclose information relevant and necessary to the investigation or inquiry, such as name, city, state, ZIP code, telephone number, email address, IP address, fraud complaints, and anything else we may deem relevant to the investigation.

(e) **Change of Control – New Owners:** Other entities, should we plan to merge with or be acquired by that entity. Should such a combination occur, we will make reasonable efforts to request that the newly combined entity follow this Privacy Policy with respect to your personal information. If your personal information would be used contrary to this policy, you will receive prior notice.

#### 6. Communication Preferences and Marketing (Opt-out)

We do not sell or rent your personal information to third parties for their marketing purposes without your consent. If you do not wish to receive marketing emails from us,

you can indicate your communications preference within the email by unsubscribing, or by contacting us via email at [privacy@avitaswealth.com](mailto:privacy@avitaswealth.com). You may not opt-out of administrative emails (for example, emails about your account transactions, emails that respond directly to your questions, or emails concerning policy changes).

## 7. Tracking Technologies (Cookies)

When you visit the Site, we and authorized third parties may use tracking technologies to enhance your online experience or customize our offerings.

A few additional important things you should know about our use of tracking technologies (cookies):

- We offer certain features that are available only through the use of tracking technologies.
- We use both session and persistent tracking technologies. Tracking technologies (e.g., cookies) can either be persistent (i.e., they remain on your computer until you delete them) or temporary (i.e., they last only until you close your browser). You are always free to decline tracking technologies if your browser permits, although doing so may interfere with your use of the Site. Refer to the help section of your browser, browser extensions, or installed applications for instructions on blocking, deleting, or disabling tracking technologies such as cookies.
- You may encounter tracking technologies/cookies from our third party service providers, that we have allowed on our site that assist us with various aspects of our web site operations and services, such as [Google Analytics](#), [Adobe Typekit](#) and others.
- You also may encounter tracking technologies from third parties on certain pages of the Site that we do not control. Such other parties may collect personally identifiable information about your online activities over time and across different web sites when you use the Site.

## 8. Accessing, Reviewing, and Changing Your Personal Information

You should promptly update your personal information if it changes or becomes inaccurate by contacting us via email at [privacy@avitaswealth.com](mailto:privacy@avitaswealth.com). We may retain your information so that we prevent fraud, assist with investigations, resolve disputes, analyze or troubleshoot programs, or take other actions to comply with or as permitted by law.

## 9. Notice to California Residents

(a) **How Do We Respond to Do Not Track Signals for California Residents:** California Business & Professions Code Section 22575(b)(as

amended effective January 1, 2014) provides that California residents are entitled to know how Avitas responds to “Do Not Track” browser settings. Avitas does not currently take actions to respond to Do Not Track signals.

## **10. Third Parties**

Our Site may contain links to other third party websites, including banks and other financial services. We are not responsible for the privacy practices or the content of these third party sites.

## **11. Security**

We store and process your information on our servers located in the United States and around the world. We maintain security measures to protect the security of your personal information against loss, misuse, unauthorized access, disclosure, or alteration. It is your responsibility to make sure that your personal information is accurate.

## **12. Children's Privacy**

The Site is directed to users 18 years of age or older and is not intended for children under the age of 13. We do not knowingly collect personal information via our Site from children in this age group.

## **13. International Transfer**

If you reside outside the United States and provide personal information to us, you consent to the collection and/or processing in the United States of your personal information and use of tracking technologies/cookies as described in this Privacy Policy. You understand that the United States government may obtain access to the personal data you submit if necessary for investigative purposes (e.g., terrorism investigation).

## **14. Notification Regarding Updates**

From time to time, we may update this Privacy Policy. You agree that we may notify you about material changes in the way we treat personal information by placing a notice on the Site. You should check the Site frequently for updates.

## **15. Contact Us**

If your questions are not answered online, you may email us at [privacy@avitaswealth.com](mailto:privacy@avitaswealth.com) or write to us at Avitas Wealth Management, LLC, 1901 Avenue of the Stars, Suite 1901, Los Angeles, California 90067.

## **16. Definitions**

**Cookies** A cookie (sometimes referred to as local storage object or LSO) is a data file placed on a device. Cookies can be created through a variety of web-related protocols and technologies, such as HTTP (sometimes referred to as “browser cookies”), HTML5, or Adobe Flash.

**Web Beacons** Small graphic images or other web programming code called web beacons (also known as “1×1 GIFs” or “clear GIFs”) may be included in our online service’s pages and messages. Web beacons may be invisible to you, but any electronic image or other web programming code inserted into a page or e-mail can act as a web beacon.

**Embedded Script** An embedded script is programming code that is designed to collect information about your interactions with the online service, such as the links you click on. The code is temporarily downloaded onto your device from our web server or a third-party service provider, is active only while you are connected to the online service, and is deactivated or deleted thereafter.

**ETag, or entity tag** A feature of the cache in browsers, an ETag is an opaque identifier assigned by a web server to a specific version of a resource found at a URL. If the resource content at that URL ever changes, a new and different ETag is assigned. Used in this manner ETags are a form of device identifier. ETag tracking may generate unique tracking values even where the consumer blocks HTTP, Flash, and/or HTML5 cookies.