

## **Code Advisors LLC**

### **Privacy and Preparedness Notice**

This Notice is provided on behalf of Code Advisors LLC and its registered representatives (collectively "CODE"). This notice may be updated from time to time. If you require this notice in an alternative accessible format, please contact us at 415-659-8088.

#### **Privacy Notice**

We recognize our obligation to keep information about you secure and confidential. It's important for you to know that we do not sell your information to anyone. We restrict access to non-public information about you to those representatives and employees who need to know that information to provide services to you. We also maintain reasonable physical, electronic and procedural safeguards to guard your non-public information.

We collect information about you from our discussions with you, from publicly available sources, from documents that you may deliver to us and from due diligence conducted in the course of our providing services to you. We may use this information to provide financial advisory or agency services for you. In order to do so, we may provide your information to firms that assist us in providing services to you and have a need for such information, as permitted by law. We may also disclose such information to the Financial Industry Regulatory Authority, the Securities and Exchange Commission, the State of California and other states or regulatory agencies that oversee our activities.

If you prefer that we not disclose non-public information about you to non-affiliated third parties (other than those disclosures required by law), you may opt out of those disclosures (that is, you may direct us not to make those disclosures). If you wish to opt out of disclosures to non-affiliated third parties, you may contact us at 415-659-8088.

If the firm or any of its representatives terminates their relationship with one another, information that has been disclosed by one to the other may be retained by both of them if they have so agreed as a part of a transfer of such portion of the business as was previously handled by the representative.

#### **Anti-Money Laundering Procedures**

To help the government fight the funding of terrorism and money laundering activities, Federal law requires us to obtain, verify and record information that identifies each person or company to whom we provide financial services. This means that when you begin doing business with us, we will ask for information that will allow us to identify you. We may also request documentation concerning the legal formation of your organization.

#### **California Privacy Rights and Disclosures**

If you are a resident of California, you may have rights under the California Consumer Privacy Act of 2018 ("CCPA"), as described in this section of our Privacy Notice. These obligations and rights apply to businesses doing business in California and to California residents and information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with California consumers or households ("Personal Information"). It does not include deidentified or aggregate information, or public information lawfully available from governmental records. In addition, not all rights in this section of our Privacy Notice is applicable to personal information that constitutes NPI subject to the Gramm-Leach-Bliley Act and our GLBA privacy notice, or processed solely in the business-to-business context, or other data that is exempt from certain requirements of the CCPA.

The following chart describes the categories of Personal Information we may have collected about you in the past 12 months and, for each category, where and why we collected it, and the categories of entities with which we shared the Personal Information, if any.

Category of Personal Information	Sources from which Personal Information was collected	Purpose of collection	Categories of entities with which Personal Information was shared
<p>Address and other identifiers – such as name, postal address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers</p>	<p>From our interactions with individuals seeking to invest, obtain our products and services, or otherwise interacting with or contacting us, including through our Sites and services</p> <p>Automated collection on our Sites, services, products, applications, databases, devices, information systems and networks, and through cookies</p> <p>Service providers, business partners and contacts</p> <p>Publicly available information</p> <p>Government sources and records</p>	<p>Client Services</p> <p>Business Operations</p> <p>Marketing</p> <p>Protection and Defense</p> <p>Regulatory and Legal</p> <p>Compliance and Oversight</p> <p>Personnel Management</p>	<p>Service providers</p> <p>Affiliates</p> <p>Business partners, financial services entities,</p> <p>Regulators/government agencies</p>
<p>Unique and online identifiers – such as IP address, device IDs, or other similar identifiers</p>	<p>Automated collection on our Sites, services, products, applications, databases, devices, information systems and networks, and through cookies</p> <p>Device inventories for Company property</p> <p>Personnel who might, for example, supply the device ID associated with their personal device for work purposes</p>	<p>Client Services</p> <p>Business Operations</p> <p>Marketing</p> <p>Protection and Defense</p> <p>Regulatory and Legal</p> <p>Compliance and Oversight</p> <p>Personnel Management</p>	<p>Service providers</p> <p>Affiliates</p> <p>Business partners, financial services entities,</p> <p>Regulators/government agencies</p>

<p>Characteristics of protected classes and demographic information,* such as age, sex, marital status; military or veteran status</p>	<p>From our interactions with individuals seeking to invest, obtain our products and services or otherwise interacting with or contacting us, including through our Sites and services</p> <p>Service providers, business partners and contacts</p> <p>Publicly available information</p>	<p>Client Services</p> <p>Business Operations</p> <p>Marketing</p> <p>Protection and Defense</p> <p>Regulatory and Legal</p> <p>Compliance and Oversight</p> <p>Personnel Management</p>	<p>Service providers</p> <p>Affiliates</p> <p>Business partners, financial services entities,</p> <p>Regulators/government agencies</p>
<p>Financial information</p>	<p>From our interactions with individuals seeking to invest, obtain our products and services or otherwise interacting with or contacting us, including through our Sites and services</p> <p>Service providers, other financial institutions, business partners and contacts</p> <p>Publicly available information</p> <p>Government sources and records</p>	<p>Client Services</p> <p>Business Operations</p> <p>Marketing</p> <p>Protection and Defense</p> <p>Regulatory and Legal</p> <p>Compliance and Oversight</p> <p>Personnel Management</p>	<p>Service providers</p> <p>Affiliates</p> <p>Business partners, financial services entities,</p> <p>Regulators/government agencies</p>
<p>Commercial information – such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</p>	<p>From our interactions with individuals seeking to invest, obtain our products and services or otherwise interacting with or contacting us, including through our Sites and services</p> <p>Service providers, other financial institutions, business partners and contacts</p> <p>Publicly available information</p> <p>Government sources and records</p>	<p>Client Services</p> <p>Business Operations</p> <p>Marketing</p> <p>Protection and Defense</p> <p>Regulatory and Legal</p> <p>Compliance and Oversight</p>	<p>Service providers</p> <p>Affiliates</p> <p>Business partners, financial services entities,</p> <p>Regulators/government agencies</p>

Education or other professional information	From our interactions with individuals seeking to invest, obtain our products and services or otherwise interacting with or contacting us, including through our Sites and services  Service providers, other financial institutions, business partners and contacts  Publicly available information  Government sources and records	Client Services Business Operations Marketing Protection and Defense Regulatory and Legal Compliance and Oversight Personnel Management	Service providers Affiliates Business partners, financial services entities, Regulators/government agencies
Audio or video footage collected using CCTV cameras	Directly from you (if you visit one of our premises that use this technology)	Protection and Defense Regulatory and Legal Compliance and Oversight Personnel Management	Service providers Affiliates Business partners, financial services entities, Regulators/government agencies
Inferences drawn from CCPA PI – such as individual profiles, preferences, characteristics, behaviors	We may create analyses from information obtained about and clients and potential clients or Code personnel	Client Services Business Operations Marketing Protection and Defense Regulatory and Legal Compliance and Oversight Personnel Management	Service providers Affiliates Business partners, financial services entities, Regulators/government agencies

\*We do not collect demographic information on job applicants.

**Your California Privacy Rights to Request Disclosure of Information We Collect and Share about You**

The CCPA grants California residents the right to request additional information about our practices with respect to Personal Information. In particular, you can request the following:

- The categories of your Personal Information that we’ve collected.
- The specific pieces of your Personal Information that we have collected.
- The categories of sources from which we collected Personal Information.
- The business or commercial purposes for which we collected or sold Personal Information.

- The categories of third parties with which we shared Personal Information.

You can submit a request to us for the following additional information:

- The categories of third parties to whom we've sold Personal Information, and the category or categories of Personal Information sold to each.
- The categories of Personal Information that we've shared with service providers who provide services for us, like processing your bill.

Additionally, under the California Shine the Light law, you may request information about the disclosure of your Personal Information by CODE to certain third parties for their direct marketing purposes. However, we do not share Personal Information with unaffiliated third parties for the third parties' direct marketing purposes. If you have any questions or wish to request further information, please email us at [info@codeadvisors.com](mailto:info@codeadvisors.com).

### **Your Right to Request the Deletion of Personal Information**

Upon your request, we will delete the Personal Information we have collected about you, except for situations when that information is necessary for us to: provide you with a product or service that you requested; perform a contract we entered into with you; maintain the functionality or security of our systems; comply with or exercise rights provided by the law; or use the information internally in ways that are compatible with the context in which you provided the information to us, or that are reasonably aligned with your expectations based on your relationship with us.

### **Your Right to Ask Us Not to Sell Your Personal Information**

The CCPA provides the right to opt out of the sale of personal information. We do not and will not sale personal information.

### **Your Right to Non-discrimination for Exercise of Your Data Rights**

If you exercise any of these rights explained in this section of the Privacy Policy, we will not disadvantage you. You will not be denied or charged different prices or rates for goods or services or provided a different level or quality of goods or services.

### **How We Will Handle a Request to Exercise Your Rights**

To exercise your right to request the deletion of your Personal Information, either click here [www.codeadvisors.com](http://www.codeadvisors.com) or contact us at 888-589-2585. These requests for disclosure are generally free.

For requests for access or deletion, we will first acknowledge receipt of your request of your request. We will provide a substantive response to your request as soon as we can, generally within 45 days from when we receive your request, although we may be allowed to take longer to process your request under certain circumstances. If we expect your request is going to take us longer than normal to fulfill, we'll let you know.

When you make a request to access or delete your Personal Information, we will take steps to verify your identity. These steps may include asking you for Personal Information, such as your name, address, or other information we maintain about you. If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to the request. We will notify you to explain the basis of the denial.

You may also designate an authorized agent to submit requests on your behalf. If you do so, you will be required to verify your identity by providing us with certain Personal Information as described above. Additionally, we will also require that you provide the agent with written permission to act on your behalf, and we will deny the request if the agent is unable to submit proof to us that you have

authorized them to act on your behalf. This subsection does not apply when an agent is authorized to act on your behalf pursuant to a valid power of attorney, which will be processed in accordance with California law pertaining to powers of attorney.

If you are making a request for information about a household, all members of the household must submit a verified request before we can respond.

#### **Additional Facts about How We Share Your Personal Information**

We may also share Personal Information with third parties at your request or where you otherwise intentionally interact with a third party; to comply with legal obligations; when we believe in good faith that an applicable law requires it; at the request of governmental authorities or other third parties conducting an investigation; to detect and protect against fraud, or any technical or security vulnerabilities; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of our business, third parties, visitors to our websites, or the public. We may also share Personal Information with any person to whom we transfer any of our rights or obligations under any agreement, or in connection with a sale, merger or consolidation of our business or other transfer of our assets, whether voluntarily or by operation of law, or who is otherwise deemed to be our successor or transferee.

#### **Preparedness/Business Continuity Plan**

CODE has developed a Business Continuity Plan describing how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur.

If after a significant business disruption, you cannot contact us as you usually do, you should call our alternative number: 415-659-8050.

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our Business Continuity Plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

We are grateful for your business. Please call us at 415-659-8088 if you have any questions or concerns or contact FINRA at [www.finra.org](http://www.finra.org) or at 800-289-9999.