



## **Privacy Policy: Protection of Your Personal Financial Information**

### **Sanctuary Advisors, LLC**

#### **Who We Are**

Sanctuary Advisors, LLC is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”). Through our Financial Advisors (registered representatives with Sanctuary Wealth’s FINRA member broker-dealer who also may be investment advisor representatives with Sanctuary Advisors, LLC, in states where such registration is required), we provide financial products and services to the general public. We are providing you with this Privacy Policy to describe how we collect information about you, under what circumstances we may disclose the information to others, and how we safeguard your information in our possession.

#### **Why We Collect Information**

We collect and use information about you in order to provide you with our financial products and services. For example, we use your information to determine the appropriateness of our investment recommendations and to process transactions for your account.

#### **What Information We Collect**

The information we collect may include personal financial information such as your name, address, social security number, assets, income, net worth, investment experience, risk tolerance, investment objective, beneficiary designations, and other information derived from your account application.

#### **How We Collect Information**

We obtain most information directly from you when you establish an account or purchase financial products or services from us. For example, we may collect your personal information directly from you when you seek financial advice about your investments, direct us to buy or sell securities, provide employment information, or provide us with your government-issued ID. We may also obtain information about you from our Financial Advisors, and from third parties such as retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies, your former broker-dealer, or its registered representative, clearing firms, or others who have provided you with financial products or services.

## **Information We Disclose**

We may disclose information about you, as described above, to our staff, affiliates, representatives, their affiliated businesses, nonaffiliated third parties who provide you with financial products and services, and our service providers, such as a mailing company. These nonaffiliated third parties may include retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies and agencies, other broker-dealers, and clearing firms. Our Privacy Policy is the same for current, as well as former clients. Also, if you close your account, in the process of transferring your investments we may share your information with the new broker-dealer or custodian that you or your Financial Advisor selects. We may disclose information such as your name, address, social security number, date of birth, transactional information, or other financial information when necessary for us to provide you with financial products and services or report on your account, or where disclosure is prescribed by law. For example, we report your tax-related information to federal and state governments, and we may disclose information during the course of an audit or to law enforcement or regulatory agencies. We do not disclose your information to nonaffiliated companies who intend to market their products to you. For example, we will not sell clients' names and addresses to a catalog or marketing company.

## **"Opting-out" of Third-Party Disclosures**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all information sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information.

## **Securing Your Information**

Our staff, affiliates, and Financial Advisors who have access to your information are required to follow our procedures reasonably designed to keep your information secure and confidential. Our physical, electronic, and procedural safeguards have been reasonably designed to protect your information.

## **Other Applicable Laws**

The practices described are in accordance with Federal Law. We also follow privacy requirements under applicable state law. If a state's privacy laws are more restrictive than those stated in this policy, we comply with those laws.

**California Residents:** The California Consumer Privacy Act ("CCPA") applies to those clients who reside<sup>1</sup> in California.

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<sup>1</sup> For purposes of the CCPA, a California resident is someone who is domiciled in California. This can include either (i) someone who typically resides in California but is on vacation elsewhere or (ii) someone temporarily domiciled in California for work.

Within the course of business, we collect Client Information regarding information from applications or other forms, identifying information, information from your transactions with us, and information from consumer reporting agencies, as outlined above. Upon request, we shall provide: (i) the categories of personal information that have been collected; (ii) the categories of sources from which the personal information is collected; (iii) what the business or commercial purpose is for the collecting or selling of personal information; (iv) the categories of third parties that the business shares personal information with; and (v) the specific pieces of personal information that have been collected about that consumer.

Your Client Information will only be disclosed to outside entities under the delineated exceptions outlined in the “Information We Disclose” section above or under any of the exceptions listed in the CCPA. None of your Client Information is sold to anyone or accessible by anyone other than the necessary Supervised Persons of Sanctuary Advisors, LLC.

Under the CCPA, California residents have a right to request the deletion of their personal information, unless that information is necessary for the business to: (i) complete the transaction requested by the California resident for which the personal information was collected; (ii) engage in internal uses reasonably aligned with the expectations of the California resident based on their relationship with the business; or (iii) otherwise use the personal information in a manner consistent with the context that the information was provided. As the use of your Client Information meets all of these exceptions, Sanctuary Advisors, LLC cannot guarantee that all Client Information collected in the course of business can be deleted upon request.

Clients who invoke their rights under the CCPA will not be discriminated against.

Sanctuary Advisors, LLC will comply with all other provisions of the CCPA.

## **Questions**

If you have questions about our privacy policy, you may contact your Financial Advisor, or you may contact us at: Sanctuary Wealth, Attention: Compliance Department, 250 West 96<sup>th</sup> Street, Suite 300, Indianapolis, Indiana 46260. You may also call us at (317) 975-7729 or contact us electronically at [compliance@sanctuarywealth.com](mailto:compliance@sanctuarywealth.com).