

Privacy Policy

The privacy policy statement is given to clients at the initial signing of the client contract and mailed or emailed with client consent once annually, if the policy is updated. The CCO will document the date the privacy policy was delivered to each client for each year if an annual delivery is required. LWM collects non-public personal information about clients from the following sources:

- Information it receives from them on applications or other forms;
- Information about their transactions with LWM or others; and
- Information it receives from a consumer reporting agency.

Below are the reasons for which LWM may share a client's personal information.

- For everyday business purposes - such as to process client transactions, maintain client account(s), respond to court orders and legal investigations, or report to credit bureaus;
- For marketing by LWM - to offer LWM's products and services to clients;
- For joint marketing with other financial companies;
- For affiliates' everyday business purposes - information about client transactions and experience; or
- For non-affiliates to market to clients (only where allowed).

If a client decides to close his or her account(s) or becomes an inactive customer, LWM will adhere to the privacy policies and practices as described in this Policies and Procedures manual, as updated.

LWM restricts access to clients' personal and account information to those employees who need to know that information to provide products or services to its clients. LWM maintains physical, electronic, and procedural safeguards to guard clients' non-public personal information.

In addition to LWMs listed access persons, any IT persons or other technical consultants employed at the firm may also have access to non-public client information at any time. An on-site or off-site server that stores client information, third-party software that generates statements or performance reports, or third-party client portals designed to store client files all hold the potential for a breach of non-public client information.

To mitigate a possible breach of the private information, LWM uses encryption software on all computers and carefully evaluates any third-party providers, employees, and consultants with regard to their security protocols, privacy policies, and/or security and privacy training.

Staff Training

On an annual basis, LWM will conduct a firm-wide training session to ensure that staff members are properly trained and equipped to implement the above policies. New staff members will receive training, led by the CCO.

LWM uses various methods to store and archive client files and other information. Third party services or contractors used have been made aware of the importance LWM places on both firm and client information security. In addition to electronic and personnel measures LWM has implemented reasonable physical security measures at its home office location.

LWM will retain records for at least 5 years after the year in which the record was produced, or as otherwise required by law. With respect to disposal of non-public personal information, LWM will take reasonable measures to protect against unauthorized access to or use of such information in connection with its disposal.