

DESTINATION WEALTH MANAGEMENT PRIVACY POLICY

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This Privacy Policy describes how Destination Wealth Management and its affiliates (collectively, “DWM”, “we”, “us”, or “our”) collect, use, store and disclose personal information we obtain from certain sources indicated below and it describes the rights applicable to California residents with respect to their personal information.

By visiting this website made available by DWM (the “Site”), you agree to be bound by the terms and conditions of this Privacy Policy and User Terms, which may be updated by us at any time. Your continued engagement with the Site or our services to which this Privacy Policy applies (see “Scope” below) after any such revisions indicates that you accept and consent to them, so please check this Privacy Policy periodically for updates. If you do not agree, please do not use or access the Site or our applicable services.

Scope

This Privacy Policy describes how we collect, use, store and disclose personal information we obtain through the Site and how, while a “business” under the California Consumer Privacy Act (“CCPA”), we (including the entities we control within our business) otherwise collect, use and disclose personal information about California residents who engage with us and as described under “Notice for DWM Job Applicants, Employees and Contractors” below, how we collect, use, store and disclose personal information we obtain from California resident job applicants, current and former employees, owners of DWM and independent contractors, during and after their working relationship with us. It also describes how we have collected, used, stored and disclosed such information for the past 12 months.

This Privacy Policy does not apply to certain information that we or our service providers collect, use and disclose with respect to individuals who engage with us for investment services. They will receive our separate Privacy Notice governed by federal law at the time they seek such investment related services.

Personal Information We Collect

We may collect and maintain personal information in a number of ways, including when you visit our office and when you contact us by email, telephone or text message.

- **Identifiers.** We collect contact information, such as name, email, address, phone number and title, if you or your representative provides us with this information in connection with prospective services or if they work with us as a service provider or vendor to our business. We also collect contact information from those who register for or attend our sponsored events. We use this information to communicate with such persons and conduct our business relationships.
- **Information Collected Through Technology.** We may collect information about you automatically to support our business operations. We may use cookies and similar technologies to detect spam and abuse, collect your browser type, browser settings, IP address, date/time stamps associated with your usage of the Site, pages and files of the Site viewed, searches on the Site, which Site features you use, internet service provider or mobile carrier. We or our service provider also may collect various online identifiers (such as usernames used to access restricted portals linked to our Site). You can control cookies through your browser settings. Disabling some cookies may affect how the Site functions. If you text with us, we also collect your mobile phone number, the content and date and time of your messages, and related delivery and mobile carrier information, which may be processed through our text messaging and communications service providers.

- Commercial Information. We may collect information needed for our operations, such as bank account information to process invoices and payments, transaction history and signatures. We also collect personal information to diligence prospective investments or as otherwise appropriate to pursue our investment strategies, such as collecting information about personnel at companies that may be seeking our investment.
- Professional and Education Information. We may collect information needed for our operations, such as background or educational information, references, emergency contact information, information to identify conflicts of interest and similar information as needed to comply with our policies and procedures.
- Other Electronic Network Activity Information. We maintain various security measures to protect our technology infrastructure and may monitor those who connect to our internet network or otherwise interact with our technology infrastructure, such as by collecting browsing history or information about the device connected to our network.
- Audio and Visual Information. We maintain various security measures to protect our premises, including video cameras, and to facilitate our operations we may also collect audio recordings from those who contact us.
- Physical Security and Biometric Information. We maintain various physical, technical and administrative security measures to protect our premises and operations, which capture personal information. These include badges to enter the building and access certain parts of the premises, and health checks as may be recommended by public health authorities.

If you have provided us with non-personally identifiable information, including anonymous information and aggregate data, we may use such non-personally identifiable information to understand better how visitors use the Site, research demographics, interests and behavior, improve the Site, provide visitors with information and for other similar purposes.

We also collect identifying information, sensitive personal information (such as social security, driver's license and passport numbers and bank account information) and commercial information as needed to effect investment transactions and provide investment services, as described in our Privacy Notice provided to those who engage with us for investment services.

Sources of Personal Information

Much of the information referenced above will have been provided by you, but some may come from other sources, such as your representatives, your business contact at DWM, automated sources (as described above) or a mutual referral contact.

Use of Your Personal Information

We use personal information under this Privacy Policy, and consistent with our separate Privacy Notice for those who seek our investment services, to operate our business. For example, we may use personal information:

- To evaluate and effect investment transactions and contracts, manage the investment services we provide you and help maintain the administration, safety, security and integrity of our business and assets;
- To comply with any applicable compliance, legal and regulatory obligations, lawful requests and legal processes (such as to respond to subpoenas and requests during government investigations) as we believe appropriate, and to comply with the compliance obligations required by our service providers;

- To communicate with you about investments, our other services and products, and updates regarding our firm;
- To improve the services provided to you, as well as understand your interests and personalize your experiences with us;
- For marketing and promotional communications (as permitted by law and to the extent you do not opt out of receiving such promotional communications); and
- On occasion, we may ask for your consent to use your personal information for purpose(s) we explain at that time.

If you do not provide requested information in connection with our operations, we may be unable in some circumstances to comply with our obligations or pursue a relationship with you, and we will tell you about the implications of that decision.

If you provide us with your mobile number for texting with us, we may send you informational text messages about our services, scheduling and your account matters. You may opt out of text messages at any time by replying STOP or contacting your account representative. Message and data rates may apply. We retain text messages we send and receive as required by applicable law and our recordkeeping obligations, including through our archiving service provider.

Information We Disclose

It is our policy not to disclose your personal information, except we may disclose your personal information as permitted by law or otherwise described in this Privacy Policy and our separate Privacy Notice for those who seek our investment services, to the following types of parties:

- Our affiliates, for our and our affiliates' purposes consistent with this Privacy Policy and consistent with our separate Privacy Notice;
- Service providers and contractors that act on our behalf and help us with our operations (for example, administrators or companies that assist us with hosting, analytics, database management services, marketing services, processing transactions, generating financial reports, data processing, tax filings, technology services, text messaging and communications platforms, and maintaining and archiving books and records), provided, that these service providers and contractors, some of which have received information within the past 12 months from all categories of personal information identified above that we collect, may use your personal information only as authorized by their contracts with us;
- Our professional advisors, such as lawyers, bankers, accountants, auditors, brokers and insurers in the course of the professional services that they render to us;
- Another company, in the case of a proposed or actual merger, or acquisition or sale of all or part of our business;
- Any third party as required to comply with a law, regulation, or legal request (including for anti-money laundering purposes, know your customer requirements, tax reporting, as we believe necessary or appropriate to comply with lawful requests and legal process, such as a request from a government authority, and in response to requests from self-regulatory organizations and non-governmental regulators), for fraud prevention, or to protect the property or rights of us or others (however, nothing in this Privacy Policy is intended to limit any legal defenses or objections that you may have to a third party or government request to disclose your information); and
- Any third party to which you direct us to disclose your personal information or which you consent to the disclosure of your personal information.

We do not sell personal information, and we do not share personal information for cross-context behavioral advertising.

Children

Our services are not directed to, and we do not knowingly collect or share personal information from anyone under the age of 16.

Do Not Track Signals

Our Site is not designed to respond to “do not track” signals received from browsers.

Global Privacy Control

Our Site does not sell or share your personal information and, therefore, does not process or respond to Global Privacy Control signals.

Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will retain your personal information for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal information, we consider applicable legal requirements, the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information, and whether we can achieve those purposes through other means. We specify the retention periods for our records, including your personal information, in our policies and procedures.

Your California Privacy Rights

If you are a California resident, you may have certain rights if your personal information is protected by applicable California law, including the following rights (subject to certain exceptions and limitations):

- **Right to Know.** You have the right to request (a) the categories and specific pieces of personal information we collect and disclose; (b) the categories of sources from which we have collected your personal information; (c) the categories of third parties to whom your personal information was shared or disclosed for a business purpose; and (d) the business purposes for such collection and disclosure of your personal information.
- **Right to Request.** You have the right to request a list of the personal information (if any) disclosed to third parties for direct marketing purposes in the prior 12 months.
- **Right to Delete.** You have the right to access and then delete your personal information that we have collected from you or maintained about you (except to the extent we are permitted or required by law to retain any record).
- **Right to Correct Inaccurate Information.** If we maintain inaccurate information about you, you have the right to request correction of that inaccurate personal information, taking into account the nature of the personal information and the purposes of the personal information processing. We will use commercially reasonable efforts to correct this information.

- Right to Limit. We do not use or disclose sensitive personal information for purposes other than those permitted by CCPA Regulations §7027(m).
- Right to Opt-Out. You have the right to opt out of the sale or sharing of personal information for cross-context behavioral advertising and the right to opt out from the use of automated decision-making technology. However, we do not sell or share any personal information for cross-context behavioral advertising and do not use automated decision-making technology for any significant decisions.

California residents also have the right to not be retaliated against for exercising any of the rights described above.

If you are a California resident and wish to exercise these rights, please contact us at 1-800-947-3864 or email at info@destinationwm.com. There are circumstances where we are not required to comply with consumer requests and we will let you know if one of those situations is applicable.

We will confirm receipt of your request within 10 business days. If you do not receive confirmation within the 10-day timeframe, please contact info@destinationwm.com.

To help protect your privacy and maintain security, we will verify your identity before granting access to your personal information or complying with your request. If you request to access or delete your personal information, we will verify your identity by comparing information we have on file against information you may provide us. If you designate an authorized agent to make a request to access or delete your personal information on your behalf, we may require you to (1) provide the authorized agent written permission to do so, and (2) verify your own identity directly with us (as described above).

We endeavor to substantively respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

Contact Details

Please contact us if you are disabled and need a copy of this Privacy Policy prepared for you in a manner that is accessible. Any such request may be made via phone at 1-800-947-3864 or via e-mail at info@destinationwm.com.

Notice for DWM Job Applicants, Employees and Contractors

This Notice for DWM Job Applicants, Employees and Contractors describes how we collect, use, store and disclose personal information we obtain from California-resident job applicants, current and former employees, owners of DWM and contractors, during and after their working relationship with us ("Employees and Contractors"). This Notice for DWM Job Applicants, Employees and Contractors applies only to Employees' and Contractors' personal information that is not exempted from the CCPA and applies only while we are a "business" as defined under the CCPA.

Employees and Contractors may exercise their California privacy rights by following the process described above and may ask us questions using the above contact information. Our data retention policy described above also applies to Employees' and Contractors' personal information.

Personal Information We Collect

We may collect the following types of personal information:

- Identifiers, such as your name, email address, physical address, telephone number, business contact information, and device identifiers;
- Records about you, such as financial information (including financial account number used for payroll), background check information (where permitted or required by law), and your physical characteristics or a description of you;
- Protected class and demographic information, such as age (including birthdates), gender and veteran or military status;
- Commercial information, such as records of business transactions, salary and wage information, and payroll and benefits data;
- Internet or other electronic network activity information, such as information relating to your use of or interactions with our networks, systems, devices, email, applications, and platforms, including your browsing history, search history, and other interactions;
- Non-precise geolocation data, such as your location as derived from using our network equipment;
- Audio, visual, or other sensory information, such as photographs, security camera footage in the public areas of our facilities, and recordings of calls and video conferences;
- Professional or employment-related information, such as job title, organization, professional licenses, credentials, specialty, professional affiliations, professional experience, references, performance and other evaluation information, disciplinary information, resumes, interview notes, human resource records, payroll or other professional information;
- Physical security and biometric information, including key fob identifiers to enter the building and access certain parts of the premises and health checks, as may be recommended by public health authorities;
- Education information;
- Inferences drawn from any of the information we collect about your preferences and behavior; and
- Sensitive personal information, such as social security number, driver's license number, or passport number; account log-in information; racial or ethnic origin (if you voluntarily provide it); content of mail, email, and text messages where we are not the intended recipient (such as messages that we monitor for compliance and security purposes); political contribution information (as required for our compliance with applicable law); information about your health; medical or health insurance information, including insurance policy number (and information about your beneficiaries); and information relating to sexual orientation, if you voluntarily provide it.

Sources of Employees' and Contractors' Personal Information

We collect personal information about Employees and Contractors through job applications and the recruitment process, either directly from them, or from our employees, agents or third parties (e.g., employment agencies, background check agencies or credit reference agencies).

We also collect personal information automatically when Employees and Contractors use our technology infrastructure, and through other interactions with us and our service providers prior to, during, or after their engagement with us (such as if an employee registers for benefits through one of our service providers).

Use of Employees' and Contractors' Personal Information

We use Employees' and Contractors' personal information as otherwise described in this Privacy Policy and as follows:

- In connection with an employment or contractor application, such as to assess the application, interview, and any test results for suitability for positions or projects; communicating with Employees and Contractors concerning position openings or their applications; conducting pre-engagement verification and screening; offering positions, in our discretion; notifying Employees and Contractors of engagement opportunities (including from our affiliates); and dealing with any inquiry, challenge, or request for feedback received in relation to our recruitment and engagement decisions;
- For human resources management, such as administering payroll and benefits (including leaves of absence and government-related programs); logistics; planning and managing travel and other reimbursable expenses; development and training; absence monitoring; timekeeping; performance appraisals; disciplinary and grievance processes; administration of termination of employment or engagement; assessing qualifications and eligibility for a particular role or project; equal employment opportunity monitoring; background checks and reference checks; and compliance programs;
- For our internal business purposes, such as managing operations and workforce engagement; enforcing our policies and rules; managing our business assets (including with respect to office locations and emergency planning); maintaining records of our operations; IT administration of our technologies, network, and intranet; analyzing and managing meeting or conferencing information (including, but not limited to, recording content, which may include voice and/or images); and providing insights into interactions with people Employees and Contractors network with;
- For our internal research and business improvement purposes;
- For legal, safety or security reasons, such as complying with legal, reporting, and similar requirements; investigating and responding to claims against us, our affiliates, personnel, and customers; for the establishment, exercise or defense of legal claims; protecting personnel safety (including managing spread of communicable diseases), property or rights; detecting, preventing, and responding to security incidents; and protecting against malicious, deceptive, fraudulent, or illegal activity;
- In connection with a corporate transaction, such as if we acquire, or some or all of our assets are acquired by, another entity; and
- For marketing or promotional purposes, including externally promoting our business (for example, we may publicly disclose the names and work contact information of certain of our representatives or post pictures of current or past personnel who attend our events).

We do not use or disclose sensitive personal information for purposes other than those permitted by CCPA Regulations §7027(m). We only process information about criminal convictions if legally required or permitted to do so, which includes, but is not limited to, the performance of any applicable background checks. We may use anonymized, de-identified, or aggregated Employee and Contractor information for any purpose permitted by law.

If an Employee or Contractor fails to provide certain personal information when requested, we may not be able to provide essential benefits to those persons (such as paying the Employee or Contractor or providing other benefits), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Minors

We do not employ or contract with children, and we do not knowingly collect personal information from children under the age of 16, except where they are listed as beneficiaries of a health insurance plan, may visit our office (to visit parents or attend an event) or other administrative purpose related to our relationship with an adult employee or other personnel. If we find out that a child under the age of 16 has

given us personal information, except for the aforementioned administrative purposes, we will take steps to delete that information.

Information We Disclose

We do not sell or share Employee and Contractor personal information for cross-context behavioral advertising. We may disclose personal information described above as permitted by law or for the purposes otherwise described in this Privacy Policy to the following types of parties: affiliates and subsidiaries; service providers that administer our benefits, compensation processes and physical and technical security; professional consultants to our business (such as lawyers, auditors, brokers and accountants); vendors necessary to complete transactions an Employee or Contractor requests; law enforcement, government agencies, and other recipients for legal, security, and safety purposes; other entities in connection with a corporate transaction; and any party to which an Employee or Contractor has consented to the disclosure of their personal information.