



GW & Wade Privacy Policy – April 23, 2019

Supplemented on January 1, 2020

An Important Notice Concerning GW & Wade's Client Privacy

At GW & Wade, LLC and GW & Wade Asset Management Company, LLC (collectively, "GW & Wade"), we believe that it is essential to protect the privacy of client information. The nature and importance of our client relationships require the highest standards of confidentiality and discretion. We have prepared this notice to provide our clients with a summary of the non-public information that we may collect and maintain during the course of our relationship, our policy regarding the use of that information and the measures we take to safeguard that information. We do not sell any client information to anyone and only share certain client information with others as described in this notice.

Information We Collect

In the course of our advisory relationship, we obtain non-public information about you (our "client"), including:

- Information we receive from you on account applications or other forms (such as your name, address, social security (or tax identification) number, and information about your employment, income, assets, beneficiaries, tax situation, and investment objectives).
- Information about your transactions with us or our affiliates (such as account activity and transactions information from other financial advisers with whom you work).
- Information we might receive from third-party advisers, investment managers or broker-dealers with whom you work.

Disclosure Policy

We do not disclose any non-public information about current or former clients or their accounts to anyone, except as permitted by law to facilitate our services to clients or as otherwise required by law. As allowed by law, we share information about current and former clients among our affiliates as necessary to help us service your account with us. For example, our investment adviser company shares client information with our affiliated broker-dealer in order to process transactions that you request. Additionally, in order to administer our services or to complete certain transactions or account changes that you request, direct or authorize, we may provide non-public client information collected by our firm to affiliated and non-affiliated companies, individuals, or groups. We also provide non-public client information to affiliated and non-affiliated companies who aggregate data to provide summary information to our affiliate parent company, Focus Financial Partners, LLC. In addition, we will release information about you if you direct us to do so, or if we are permitted or required by law, to government and regulatory agencies. We may also release information in order to comply with a legal summons, court order, subpoena or similar legal process, if required to do so.

Information Security

We have implemented procedures designed to restrict access to your nonpublic client information only to those employees who need it to perform their job. We maintain reasonable and appropriate administrative, physical, and technical safeguards that comply with applicable state and federal law to safeguard your non-public client information.

At any time during a client's relationship with our firm, they may instruct us not to share any non-public, personal information. In the event the client wishes us to not share information, the client must provide notice either in writing to GW & Wade 93 Worcester Street, Wellesley, MA 02481 or by contacting their representative directly.

You may also view our Privacy Policy at any time online at www.gwwade.com.



GW & Wade

California Supplement to Privacy Policy

January 1, 2020

This Supplement should be read in conjunction with our Privacy Policy. In order to continue to make the offering and promotion of our services relevant and topical, for marketing purposes we collect nonpublic information regarding your interaction with our website (including blogs and other articles) and advertisements on social media as well as nonpublic information you provide to us at events we host. We never sell your information. To the extent provided by applicable law, California consumers and their agents have the right to request that we tell you what categories or specific pieces of personal information we collect, use, disclose or sell and to request deletion. To make a request, please contact us either by email or by telephone. We do not discriminate against California consumers who exercise these rights.

info@gwwade.com

877-499-1133 (toll-free)

This California Supplement to our Privacy Policy was last updated in January 2020. Material updates may be found on our website. www.gwwade.com