

Clearwater Capital Partners

Privacy Policy

Clearwater Capital Partners (CCP) requires that our clients provide current and accurate financial and personal information in accordance with regulatory and industry standards. CCP will protect the information you have provided in a manner that is safe, secure, and professional. CCP and its employees are committed to protecting your privacy and to safeguarding that information.

Safeguarding Customer Documents

We collect non-public customer data in forms, in written notations, and in documentation provided to us by our clients for evaluation, registration, licensing, or related consulting services. We also create internal documents containing such data.

During regular business hours, access to client records is monitored so that only authorized employees may access these files. During hours in which the company is not in operation, all client records and documents will be securely locked.

No individual who is not so authorized shall obtain, or seek to obtain, personal and/or financial client information. No individual with authorization to access personal and/or financial client information shall share that information in any manner without meeting the requirements below. Failure to observe and comply with CCP procedures regarding client and consumer privacy, will result in discipline and may lead to termination.

Sharing Nonpublic Personal and Financial Information

CCP is committed to the protection and privacy of our clients' personal and financial information. CCP will not share such information with any affiliated or non-affiliated third party except:

- When necessary to complete a transaction in a client account, such as with the clearing firm or account custodians;
- When required to maintain or service a client account;
- To resolve client disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the client;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants, and auditors of the firm;
- In connection with a sale or merger of CCP's business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims, or other liability;
- To comply with federal, state or local laws, rules, and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- In any circumstances with the client's instruction or consent; or
- Pursuant to any other exceptions enumerated in the California Information Privacy Act.

Opt-Out Provisions

It is not a policy of CCP to share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service client accounts or is mandated by law, there are no allowances made for clients to opt out.

CLEARWATER CAPITAL PARTNERS

Identity Theft and Cyber Security

Identity theft is a growing problem for consumers, with ever increasingly sophisticated criminals attempting to gain and misuse the personal information of others for financial gain. Clearwater Capital Partners (CCP) has recognized the need to further safeguard our clients' information in order to protect against identity theft.

Safe Transfer of Documents

CCP has invested in sophisticated electronic delivery methods that allow us to securely send emails that contain personal information to our clients and also to obtain electronic signatures. The firm has also established a unique fax number that is connected to a fax machine in a secure office that is locked each night to protect any overnight faxes that arrive. If CCP needs to pass sensitive information to a client, the following methods are considered secure and may be used:

- Secure Document Vault within the CCP Portal
- Secure Email
- Fax
- Hard copy mailed via USPS, FedEx, UPS, or similar

Policies to Protect Your Information

CCP is committed to the protection and privacy of our clients' personal and financial information. The following are ways that you can protect your information when interacting with CCP:

- Never email personal information (social security numbers, account numbers, etc). You may upload personal information through your secure document vault within the CCP portal, or you may fax or mail the documents. If you have any issues accessing your secure document vault, please contact CCP for assistance.
- Any request to distribute money out of an account managed by CCP must be requested over the phone, and not through electronic communication, or voicemail. These requests will be followed up with a phone call confirmation, during which a CCP employee may request information to verify your identity;
- Always communicate with CCP through phone, hard copy letter, and email.
- Trade requests must be made over the phone and cannot be processed from a voicemail;
- CCP employees will never ask you to sign a blank account document. Be sure required fields are filled in before signing any form;
- Never share your username and passwords for financial and email accounts with others. CCP employees are prohibited from having your login information for any financial accounts;
- CCP will never email you asking for your Social Security Number or account numbers;
- CCP Employees may ask for identity verification if they do not recognize you prior to releasing personal information;
- Alert CCP if you suspect you are the victim of identity theft as soon as possible;

Emergency Access to Funds

If you are unable to reach CCP due to a significant business disrupting event, such as a natural disaster or a cyber attack, you may always contact the custodian of your funds directly by calling the custodian of your accounts. Clients utilizing custodial services from Charles Schwab Advisor Services should call 1-800-515-2157. Clients using the custodial services of LPL Financial should call 1-800-558-7567. Please note that this number should only be used in case of emergency and not for day to day account management requests.
