

Privacy Statement

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1. Introduction

This Privacy Statement (“Statement”) explains how Ground Control Business Management and its subsidiaries (“Ground Control”) collect, use and disclose your personal information, including the categories of personal information we process and the purposes for which we use it. Throughout this Statement, Ground Control may be referred to as “we”, “us”, “our” or “Ground Control”. The Ground Control group of entities include Ground Control Business Management, Clay GBP Limited, Wiles + Taylor & Co, Inc., Harabedian, Hall & Co., LLC, Wealthspire Ceres Financial LLC, Tanner Mainstain Glynn & Johnson, LLC, RSL and Company, LLC, and Ronald S. Litvak & Company, LLC, Arena Wealth (Golf) Limited, Arena Wealth Financial Management (Golf) Limited), C & A Company Secretarial Services Limited, and Orbit Productions Company Limited.

This Statement applies to any personal information you provide to Ground Control and any personal information we collect when you contact us, visit or use www.gcbm.com (the “Site”), visit an Ground Control location, attend Ground Control events or seminars, request or use a service from us or use other services that refer to or link to this Statement (each, a “Service”). The personal information we collect varies depending upon your location, the nature of the Services we provide and how you interact with us. This Statement may be supplemented by additional privacy statements, terms or notices, websites, subsites, of our affiliated companies relevant to your location and the applicable Services. The Ground Control company who is responsible for, or administers, the Service is also primarily responsible for processing the personal information provided to us or collected by or for the Service.

Not covered by this Statement. This Statement does not apply to (i) your use of any third-party sites linked to from the Site or our Services; (ii) job applicants and candidates who apply for a employment with us through our Ground Control application portal or to our employees whose personal information is subject to different privacy notices which are provided to such individuals in the context of their employment or working relationship with a Ground Control group entity; or (iii) or Services covered by the Financial Privacy Notice below.

Special Notice for International Users. If you are visiting this Site from outside of the United States, please be aware that the Site is operated from the United States. Accordingly, information we obtain through the Site will be collected, processed, and stored in the United States. The data protection laws and regulations applicable to your personal information in the United States may be different from the laws in your country of residence.

2. Collecting your information

Types of information we collect

The personal information we collect varies depending upon the nature of our Services. Where we collect sensitive personal information (such as health information), this information is only collected where strictly relevant to the Services we provide and is done in accordance with applicable law.

The information we collect about you may include the following:

a.	Contact details: such as your name, email, postal address, social media handle, and phone number.
b.	Unique identifiers: such as passport number, driver's license, national ID, National Insurance Number or pension scheme reference number.
c.	Demographic details: such as your date of birth, age, gender, race, photo, marital status, lifestyle, financial investment and insurance requirements.
d.	Employment information: such as job title, employee number, employment status, salary, employment benefits, and employment history, qualifications and affiliations.
e.	Health information: such as medical records, health status and medical assessment outcomes.
f.	Retirement and Benefits information: such as benefit and retirement elections, pension entitlement information, date of retirement and any relevant matters impacting your benefits e.g. voluntary contributions, pension sharing orders, tax protections or other adjustments.
g.	Financial information: such as credit history and bankruptcy status, salary, tax code, third-party deductions, bonus payments, benefits and entitlement data, national insurance contributions details, investment performance and income, account statements, trading histories, or portfolio investments.
i.	Marketing and communications preferences: such as interests and preferred language.
j.	Online information: such as computer, device and connection information (e.g. IP address, browser type, operating system, unique device identifier), and usage data collected when visiting our Site.
k.	Events information: such as information about your interest in and attendance at our events, including provision of feedback forms.
l.	Background checking information: such as inclusion on a sanctions list, public list of disqualified persons, entities, or countries, or information in relation to politically exposed persons.
m.	Comments, feedback or other information provided to us: such as social media interactions with our social media presence, comments provided on feedback forms or surveys and questions or information sent to our support services.
n.	Account login credentials: such as username and password, password hints and security information related to a Service we provide.

o.	Payment information: such as credit or debit card number and bank account details.
q.	Audio, video and other electronic data: audio, electronic, visual or similar information such as, CCTV footage, photographs, and call recordings.

Sources of information

We collect personal information about you in the following ways:

a.	Information you provide directly to us: we collect personal information about you when you request a Service from us; visit a Ground Control site or attend a Ground Control event or seminar; through your use of our Services; provide comments, feedback or communicate directly with us. Where we obtain information directly from you, we will inform you of whether the information is mandatory and the consequences of not providing us with the information. For example, we need to obtain your contact details in order to provide you with a Service or communicate directly with you. Where you do not provide us with the relevant information, we may be unable to offer the Services to you and/or we may terminate the Services if not possible to fulfil the Services without the respective information.
b.	Information from your employer: we may obtain personal information about you from the company with which you are employed or affiliated, in order to provide Services to them and/or manage your access to and use of the company's Service.
c.	Information we collect automatically: we may collect certain types of information about you automatically when you use our Services, visit the Site, or communicate with us online or through the e-mails that we may exchange. We may collect this information through the use of "cookies" or similar technologies such as web beacons, gif or pixel tags or other unique identifiers to measure online activity, provide more relevant advertising or analyze the effectiveness of communications or our promotional campaigns. Further information about our use of cookies can be found in Use of Cookies and Tracking Technologies section below and relevant Cookie Setting reference at the footer of our page of the Site (where applicable).
d.	Information from third parties: we may collect personal information about you from other third parties, such as account custodians, accountants, financial advisors, insurers, credit reference agencies, medical professionals, government bodies, claimants, sponsors, joint venture entities or business partners, as well as vetting and data validation agencies and other professional advisory service providers.

Information you provide relating to third parties

Where you provide personal information to Ground Control about third-party individuals from whom you have consent to share their information (e.g. your spouse, civil partner, child(ren), dependents or emergency contacts), where appropriate, you should provide these individuals with a copy of this Statement beforehand or ensure they are otherwise made aware of how their information will be used by Ground Control. Where you provide information to us about your beneficiaries, you confirm that you've received consent to do so on their behalf.

We use cookies and other types of tracking technologies (collectively, "Cookies") on the Site to collect and

analyze information about visitors' interactions with the Site. The Cookies we use are placed by us or by our vendors. We and our vendors may link the information collected by Cookies to other information collected about you.

What are Cookies?

A cookie is a small text file saved by your internet browser when you visit a website. Cookies may carry out various functions; for example, they may (1) store information to help our Site function properly; (2) recognize your device when you visit our Site again; and/or (3) help us understand your use of our Site over time. We may use cookies to:

- Enhance your experience on our Site by improving navigation speed.
- Recognize your preferences, so that you do not need to enter the information each time you visit the Site.
- Customize your browsing experience on our Site by showing you information more likely to be relevant to you.
- Learn about your visit to our Site, for example, by collecting information about which pages on our Site you viewed or links you clicked and how you interacted with our content during your visit or over multiple visits.
- Provide advertising, including targeted advertising.

We may use a type of tracking technology called web beacons (or pixel tags or clear GIFs). Web beacons are an often-invisible way to see if someone has used or accessed certain content. We primarily use web beacons to help us understand which areas of our Site are most popular with our visitors and to improve and update the content on our Site in response. Additionally, web beacons can help us measure the effectiveness of our advertising, for example, by counting the number of individuals who visit our Site or click a link within it.

We also may use tracking scripts. A tracking script is a piece of programming code designed to collect information about your interactions with the Site. It is temporarily downloaded onto your device and is active while you are connected to the Site. The tracking script is typically deleted or deactivated thereafter.

What information do Cookies collect and store?

Cookies frequently store the name of the website and a unique ID associated with your browser or device. This information allows the relevant website to retrieve or provide the correct information. Each Cookie, for example, retrieves information it stores or provides information related to the Cookie.

Cookies are typically used to collect and store your personal preferences (such as your time zone or font size preferences), information needed to authenticate you as a valid website visitor, your IP address, the type of device you use and its operating system, and information about your use of a website, such as the links you click, how often you visit the website, and how you arrived at the website.

How do you opt out of Cookies?

Depending on your browser and geographical location, you may be able to block the use of Cookies when you visit our Site. Please note that blocking some types of Cookies may adversely affect your ability to use our Site or hinder certain functionality on the Site.

- Opting Out of Cookies Using Self-Regulatory Programs: A self-regulatory program is available to help consumers control the use of Cookies on their browsers — the Digital Advertising Alliance. The program helps to regulate vendors in the digital advertising space. One function of the self-regulatory program is to give you the ability to opt out of targeted (or interest-based) advertising, including

Cookies, from their member companies. You can visit <https://youradchoices.com/control> for the Digital Advertising Alliance's WebChoices tool to review your opt outs.

- **Opting Out of Cookies Using a Browser:** You may be able to disable Cookies using your browser settings. Please review your browser's instructions or visit All About Cookies for general information. Your browser settings may allow you to transmit a "Do Not Track" signal when you visit websites. Given the current lack of industry consensus regarding "Do Not Track" signals, our Site does not currently recognize them.

For additional information on your right to opt out, please see the U.S. State-Specific Disclosures, below.

Vendor-Specific Disclosures

Vendor Cookies we use may include:

- **Google Analytics.** You may choose whether to permit Cookies from Google Analytics by using [Google's Opt-Out Browser Add-On](#). You may visit Google's [Privacy Policy](#) for additional information about how Google collects and uses personal information from the Google products we use.
 - **YouTube.** YouTube API Services may collect, store, use, process and disclose personal information, including from your devices, as described in this Notice and to serve content. You can revoke access to your personal information collected and processed through the YouTube API Services using [Google's Security Settings](#). Please note that when you use the YouTube Player through our site, you remain bound by YouTube's [Terms of Service](#).
- **Microsoft.** We also use Microsoft's Universal Event Tracking feature, which allows Microsoft to collect and process some of your personal information. Please visit Microsoft's [privacy statement](#) for additional information about their privacy practices, including how to access your personal information or control Microsoft's use of your personal information. Please also visit Microsoft's [Privacy Statement](#) for information on how Microsoft collects or receives personal information through tracking technologies to provide Microsoft Advertising.
- **LinkedIn Insight Tag.** We use the **LinkedIn Insight Tag** on our website, a web analytics and conversion tracking service provided by **LinkedIn Corporation** (1000 W. Maude Ave, Sunnyvale, CA 94085, USA).
 - **How it works:** This tag places a unique cookie in your web browser when you visit our site. If you are a LinkedIn member and log into your account, LinkedIn can associate your visit to our website with your LinkedIn profile.
 - **Data collected:** The tag collects technical data, including your IP address, device and browser characteristics, timestamp, and page view events (URLs and referrers).
 - **Purpose:** We use this data to track the performance of our LinkedIn advertising campaigns, build retargeting audiences, and view aggregated, anonymized demographic reports about our website visitors. We do not receive any personally identifiable information about individual LinkedIn members.
 - **Data retention:** LinkedIn anonymizes collected IP addresses. Linear data is encrypted and deleted within **90 days**, while aggregated reports are kept for up to six months.
 - **Opt-Out & Control:** You can prevent LinkedIn from collecting this data via our website's cookie consent banner by declining analytics and marketing cookies. If you are a LinkedIn member, you can also opt out of targeted advertising by adjusting your [LinkedIn Advertising Preferences](#) or by visiting the [Digital Advertising Alliance opt-out page](#). For more details, please review the [LinkedIn Cookie Policy](#).
- **HubSpot.** We use HubSpot services to support and present our Site. To learn more about HubSpot's privacy policy, including opt-out options, click here: [HubSpot Privacy Policy](#), and information on their cookie policy may be found here: [HubSpot Cookie Policy](#).

3. Processing your information

We will use the information we collect about you in connection with the Services to:

a.	offer, deliver and implement the Services provided to you;
b.	carry out due diligence, identity, credit reference, bankruptcy, sanctions, data validation, anti-money laundering, “Know Your Customer” and other business acceptance, vetting and risk management checks;
d.	process payments, including your payments for bills and expenses, taxes, investment withdrawals, and other investment and insurance related costs.;
f.	facilitate the prevention, detection and investigation of crime and the apprehension or prosecution of offenders;
g.	enforce our agreements, trace debtors and recover any outstanding debt in connection with the Services provided;
h.	fulfil legal and regulatory obligations, resolve disputes and monitor compliance with the same;
i.	transfer books of business to successors of the business in the event of a sale or reorganization, including the planning and due diligence purposes both prior to closing and after a transaction has closed;
j.	manage and ensuring the security of our business operations, assets, Services, network and information and technology resources;
k.	perform analytics for risk modelling purposes and to analyze trends;
l.	conduct market research and canvass your views about the Services and to develop and improve our products and Service offerings generally;
m.	offer other products and Services that may be of interest to our clients, prospective clients and individual representatives of our corporate clients, including sending newsletters, know-how, promotional material and other communications;
n.	communicate with you and to respond to your requests, inquiries, comments and concerns;
o.	research, audit, reporting and other business operations purposes, including determining the effectiveness of our promotional campaigns and evaluating business performance;
p.	perform benchmarking, modelling, market research and data analysis associated with the development of new and existing processes, products and Services;
q.	invite you to events or seminars, including arranging and administering those events; and
r.	record phone calls in connection with the Services provided to you.

4. Accuracy of your information

We rely on the availability of accurate personal information to provide the Services to you and operate our business. You should therefore notify us of any changes to your personal information, particularly changes concerning your contact details, bank account details, employment status, or any other information that may affect the proper management and administration of our Services to you.

5. Recipients of your information

We may from time to time share your personal information with the following categories of recipients where necessary to offer, provide, and implement the Services provided to you.

a.	Within Ground Control: we may share your personal information with other Ground Control entities, brands, divisions, and subsidiaries for the processing purposes outlined in this Statement.
b.	Financial market and industry participants: where necessary to offer, administer and manage the Services provided to you, such as account custodians, tax professionals, investment managers, and other financial intermediaries with whom to directly contract. You should refer to the privacy notice on their website for further information about their privacy practices.
c.	Legal advisers, loss adjusters, and claims investigators: where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature.
d.	Law enforcement bodies: where necessary to facilitate the prevention or detection of crime or the apprehension or prosecution of offenders.
e.	Regulators and government bodies: where necessary for us to comply with our legal and regulatory obligations.
f.	Third party suppliers: where we outsource our processing operations to suppliers that process personal information on our behalf. These processing operations shall remain under our control and will be carried out in accordance with our security standards and strict instructions.
g.	Successors of the business: where Ground Control or the Services are sold to, acquired by or merged with another company, in whole or in part. Where personal information is shared in these circumstances it will continue to be used in accordance with this Statement.
h.	Internal and external auditors: where necessary for the conduct of company audits or to investigate a complaint or security threat.

6. Overseas transfers of your information

We operate in countries outside of the United States, and we may therefore transfer personal information about

you to other countries to be processed for the purposes outlined in this Statement. We may make such transfers to offer, administer and manage the Services provided to you and improve the efficiency of our business operations. We endeavor to ensure that such transfers comply with all applicable data privacy laws and provide appropriate protection for the rights and freedoms conferred to individuals under such laws.

Where we collect personal information about you in the UK or the European Economic Area (the “EEA”) we may transfer the information to countries outside the UK or EEA for the processing purposes outlined in this Statement. This may include transfers to Ground Control group entities or third parties in countries that the European Commission (the “EC”) and UK data protection regulator consider to provide adequate data privacy safeguards and to some countries that are not subject to an adequacy decision (which includes participants under the EU Data Privacy Framework, or the UK Extension to the Data Privacy Framework, also known as the UK-US Data Bridge). Where we transfer personal information to countries that are not subject to an adequacy decision we shall put in place appropriate safeguards, approved by the European Commission or UK data protection regulator. Transfers within Ground Control group are covered by contracts which contain the European standard contractual clauses to ensure that personal information about you receives an appropriate and consistent level of protection across the Ground Control group entities. Transfers to third parties will be subject to contractual commitments that provide for an adequate level of protection for your personal information.

Where we collect personal information about you in the UK, EEA or the EC, we will use the information we collect about you in connection with the Services and we rely on an appropriate legal ground for such use.

a.	Performance of the contract	Where we offer Services or enter into a contract with you to provide Services, we will collect and use your personal information where necessary to enable us to take steps to offer you the services, process your acceptance of the offer and fulfil our obligations in the contract with you.
b.	Legal and regulatory obligations	The collection and use of some aspects of your personal information is necessary to enable us to meet our legal and regulatory obligations.
c.	Consent	You may also provide us with your consent to receive certain Services, marketing or communications from us (where legally required). In such situations, you are not obliged to provide your consent and you may choose to subsequently withdraw your consent at any stage once provided. However, where you refuse to provide information that we reasonably require to provide the Services, we may be unable to offer you the Services and/or we may terminate the Services if not possible to fulfil the Services without the respective information.

d.	Legitimate interests	The collection and use of some aspects of your personal information is necessary to enable us to pursue our legitimate commercial interests. For example, we have legitimate interests in: • providing professional Services across all Ground Control solution lines; • understanding and responding to inquiries; • receiving information from third parties and Ground Control affiliates to provide Services; • sharing data in connection with mergers and acquisitions and transfers of business; • preventing and detecting fraud; • improving our Services; and • understanding how you and our clients use our Services and the Site.
f.	Substantial public interest or exemption regulations pursuant to local laws.	If applicable laws allow, we may collect and use your personal information for a substantial public interest or specific exemptions provided under such laws. We may also use your personal information to prevent and detect unlawful acts, fraud, other financial crime, and crime generally in the business management, investment and financial services industry.
g.	The establishment, exercise or defense of legal claims.	We may also need to process some sensitive personal information for the establishment, exercise or defense of legal claims by us or third parties.

We may make disclosures where we receive a request from a foreign regulatory body. We will make such disclosures where an adequate level of protection is in place, or an exemption applies. In any event, such requests will be carefully validated before personal information is disclosed. Where necessary, we may implement additional technical, organizational or contractual measures to ensure an adequate level of protection for your personal information. You can obtain further information concerning these safeguards by contacting us.

7. Retention of your information

We retain appropriate records of your personal information for as long as is reasonably necessary for the purposes listed above, to operate our business and comply with our legal and regulatory obligations. These records are retained for predefined retention periods that may extend beyond the period for which we provide the Services to you. For example, we retain certain details of your contract until the time limit for claims arising from the Service has expired, or to comply with regulatory requirements regarding how long such information is retained for. In some cases, we may retain personal information if we reasonably believe there is a prospect of litigation.

Where personal information is no longer needed for the purposes listed above, we may de-identify the information in order to use it for statistical purposes, or to perform business analytics or product and service development. We may retain anonymized information indefinitely. We have implemented appropriate measures to ensure your personal information is securely destroyed in a timely and consistent manner when no longer required. If you would like to know more about how long your personal information is retained for, please contact us.

8. Information Security

The security of your personal information is important to us, and we have implemented appropriate security measures to protect the confidentiality, integrity and availability of the personal information we collect about you and ensure that such information is processed in accordance with applicable data privacy laws. While we evaluate these measures on a regular basis to help ensure the security of the processing of personal information, please be aware that, despite our ongoing efforts, no security measures are perfect or impenetrable.

9. Your Information Rights

You have the following rights under applicable data privacy laws in respect of any personal information we collect and use about you:

a.	Right to access: a right to request access and inspect your personal information or request a copy of the information being held about you.
b.	Right to correction: a right to request the correction of your personal information or in cases where the accuracy of information is disputed, to supplement the information to give notice that you dispute its accuracy.
c.	Right to erasure: a right to request the erasure of your personal information, particularly where the continued use of the information is no longer necessary, subject to our retention practices described in this Statement.
d.	Right to object to processing: a right to object to the use of your personal information, particularly where you feel there are no longer sufficient legitimate grounds for us to continue processing the information.
e.	Right to object to direct marketing: a right to object to the use of your personal information for direct marketing purposes.
f.	Right to restrict processing: a right to request the restriction of your personal information from further use, e.g. where the accuracy of the information is disputed, and you request that the information not be used until its accuracy is confirmed.
g.	Right to portability: The right to request that some aspects of your personal information be provided to you or a third party of your choice in electronic form to enable its reuse.
i.	Right to withdraw consent: where the processing of your personal information is based on consent, you can request to withdraw your consent at anytime. Where you exercise this right, it will not affect the lawfulness of the processing carried out prior to the withdrawal of consent.

j.	Right to request a copy of, or reference to the safeguards we implement to transfer your personal information outside the EEA or the UK: where you exercise this right, we may redact some commercially sensitive information within such documents.
k.	Right to lodge a complaint with a regulator: a right to complain to the relevant data protection regulator about our processing of your personal information.

It is important to note, however, that some of the rights described above can only be exercised in certain circumstances or countries and may be limited or restricted by applicable and local data privacy laws. If we are unable to fulfil a request from you to exercise one of your rights under applicable data privacy laws, we will write to you to explain the reason for refusal. Where required, further information concerning these rights and their application can be obtained by contacting us using the contact details set out below.

10.Direct Marketing

We will use your personal information to send you direct marketing about other products and services that we feel may be of interest to you, in the form of letter, email, SMS, telephone or online advertisements. Where required by applicable law, we will obtain your informed consent prior to sending you direct marketing. We will give you the opportunity to refuse direct marketing at the point that you apply or register to receive the services and, on each occasion, thereafter that you receive direct marketing communications from us. You can also change your marketing preferences at any stage by contacting us. Please note that, even if you opt out of receiving direct marketing communications, we may still send you service-related communications where necessary.

By opting into SMS from a web form or other medium, you are agreeing to receive SMS messages from Ground Control. This includes SMS messages for account notifications, customer care. Message frequency varies. Message and data rates may apply. SMS consent is not shared with third parties.

11.Automated Decisions and Artificial Intelligence

Where you apply or register to receive a Service, we do not use any real-time automated assessment to determine whether you are eligible to receive the Service. An automated assessment is an assessment carried out automatically using technological means (e.g., computer systems) without human involvement.

AI Statement

Ground Control is focused on providing our clients with exceptional service and constantly looking for new ways to better serve. To do this, we use advanced analytics, including technologies that we collectively refer to as artificial intelligence or “AI” for simplicity. These technologies can help us streamline and automate processes, detect and prevent fraud, personalize your experience, and support efficient pricing and delivery of our Services. The AI Statement is intended to provide transparency regarding our practices and principles relating to the use of AI, including compliance with applicable laws, responsible use, data sourcing, technical and organizational measures, transparency, and risk management. We strive to ensure our use of AI is transparent and easy to understand. We are committed to using technology responsibly, ethically, and in compliance with applicable laws and regulations. Our goal is to ensure that AI enhances your experience while protecting your rights through these guiding principles.

- **Fair and inclusive.** We manage our AI systems to ensure they treat clients fairly.
- **Secure and responsible.** We strive to ensure that the data used in our AI systems is handled responsibly and protected with security measures in alignment with our data protection efforts. We review and monitor our AI systems and uses to make sure they’re working as intended and remain secure.

- **Human oversight.** AI helps our employees analyze information and improve our products and services — but humans guide and monitor the technology.
- **Built on trust.** We follow internal policies and industry standards to ensure our use of AI aligns with our core values — service, integrity and trust.

We do not use customer personal information to train publicly available or third-party generative AI models. Where we use artificial intelligence technologies to assist in delivering our services or operating our business, such technologies operate within our controlled environment and are subject to our security, privacy, and AI governance standards.

12.Complaints

If you wish to make a complaint about the way we use your personal information you should raise this with us by contacting us using the contact details set out below.

However, if you are not satisfied with the way we have handled your complaint you have the right to raise the matter with the relevant data protection authority or regulator in your applicable state or country.

13.Contact us

If you have any questions about the content of this Statement or the rights conferred to you under the applicable data privacy laws, you should contact Ground Control's Privacy Office at privacyoffice@wealthspire.com or at the following addresses:

Ground Control
c/o Privacy Office
1250 S Capital of Texas Hwy, Building 3, Suite 415
Austin, TX 78746
1-888-776-4821

14.Changes to this Statement

This Statement is not contractual, and Ground Control reserves the right to reasonably amend it from time to time to ensure it continues to accurately reflect the way that we collect and use personal information about you. The effective date set forth at the bottom of this page indicates the last time this Statement was revised. Any updates or changes to this Statement will be made available to you on the Site. You should periodically review this Statement to ensure you understand how we collect and use your personal information.

This Statement was last updated on September 30, 2026.

This section does not apply where we collect personal information subject to the Gramm Leach Bliley Act (“GLBA”), such as when you apply for, or obtain a financial product or service from us. This section is a supplement to our main privacy Statement.

California.

We provide the following California Privacy Notice (“Notice”) in accordance with the California Consumer Privacy Act of 2018 (“CCPA”), as amended, to give California **consumers** information about how we **collect**, use and disclose their **personal information** — and about the rights and choices we offer California **consumers** regarding our **processing** of their **personal information**.

Bold terms throughout this Notice are used as defined in the CCPA.

This Notice describes how we **collect**, handle, and otherwise **process personal information** in relation to your use of any of the services, the Site, and apps we may offer (collectively, the “Services”). The Notice is a statement of our practices and of rights regarding your **personal information** and is not a contractual document and does not create any rights or obligations on either party beyond those which already exist under data protection laws.

This Notice covers those applicable Services offered by Ground Control in California to **consumers** and their **households**; however, this Notice does not apply, and excludes Services of our companies, as follows:

- For our offices and operations conducted outside of California.
- For our offices and operations with separate privacy policies or that do not incorporate this Notice.
- When we act as a business associate to covered entities in connection with receiving Protected Health Information as defined under the Health Information Portability and Accountability Act (“HIPAA”).
- When we act as **service provider** since we are **processing personal information** only on behalf of our clients, often pursuant to a written engagement or formal broker of record engagement, and then only to provide our service pursuant to such engagement.
- To **personal information** that was **collected** from a **consumer** in connection with being a job applicant, employee or independent contractor.

PERSONAL INFORMATION WE COLLECT, USE, AND DISCLOSE

We collect the **personal information** about California **consumers** as set forth in and described in our main privacy Statement. We collect personal information from the Sources identified and for the Purposes noted below. We disclose personal information to the Recipients described below, and where required by law, we also require that such parties maintain their confidentiality and appropriate systems and **processes** to ensure its security and protection.

- Sources: Consumer, business partners, clients
- Purposes: Providing Services, security, compliance & operations, research & development, quality control & audit, advertising.
- Recipients: Business partners, our companies, Government entities, **service providers third parties**, operating systems & platforms, business/asset purchasers

Children’s Information

We do not knowingly **sell** or **share personal information** of consumers under the age of 16. Our Services are marketed towards corporate entities and adults. If we are notified that we have **collected personal information** of a child under the age of 16, we will delete the information as required by law.

CALIFORNIA CONSUMER PRIVACY RIGHTS

California **consumers** have the following rights regarding their own **personal information**. Please note that the CCPA limits these rights by, for example, prohibiting us from providing certain **sensitive personal information** in response to an access request and limiting the circumstances in which we must comply with a deletion request. If we deny your request, we will communicate our decision to you. To exercise any of these rights, please submit a request to the Ground Control Privacy Office via e-mail at privacyoffice@wealthspire.com or by calling 1-888-776-4821.

Please note that, if you submit a request to know, request to delete, or request to correct, you will be asked to verify your identity in accordance with the law. You may designate an authorized agent to make a request on your behalf; however, you may need to verify your identity directly with us before your request can be **processed**. An authorized agent may submit a request on your behalf. We will never discriminate against you for choosing to exercise any of your privacy rights.

- Right to Know. You have the right to know what **personal information** we have **collected** about you, which means you may ask for:
 1. The categories of **personal information** we have **collected** about you, including:
 - The categories of sources from which the **personal information** was **collected**.
 - Our **business** or **commercial purposes** for **collecting** and disclosing **personal information**.
 - The categories of recipients to which we disclose **personal information**.
 - The categories of **personal information** that we disclosed for a **business purpose**, and for each category identified, the categories of recipients to which we disclosed that particular category of **personal information**.
 2. The specific pieces of personal information we have collected about you.
- Right to Delete. You can request **personal information** be deleted.
- Right to Correct. If you believe that the **personal information** we have about you is inaccurate, you have the right to request that we correct that information.
- Right to Opt Out of Sales and Sharing of Personal Information. Some of our disclosures may be considered a sale or share for cross-context behavioral advertising. We collect, sell, or share, the following categories of personal information for commercial purposes: identifiers, characteristics or demographics, commercial information, internet activity, non-precise geolocation data, and inferences drawn from any of the above. The categories of third parties to whom we sell or share your personal information include, where applicable, vendors and other parties involved in cross-context behavioral advertising

To opt out of sales and shares through tracking technologies the Site, click [here](#) to manage your cookie preferences or enable a recognized opt out preference signal such as [Global Privacy Control](#) through your browser. Because we typically do not associate information collected through tracking technologies information collected through tracking technologies with information in our systems, the opt out will apply only to the browser from which you opt out. If you delete or reset your cookies, or switch browsers, you will need to reconfigure your settings.

We will keep your **personal information** for as long as we have a relationship with you subject to our main privacy Statement and retention practices. Once our relationship with you has come to an end, we will retain your **personal information** for a period that enables us to:

- Maintain business records for analysis and/or audit purposes.

- Comply with our record retention requirements under the law and our corporate policies.
- Defend against or bring any existing or potential legal claims.
- Deal with any complaints regarding the Services.

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the personal information.

CALIFORNIA'S SHINE THE LIGHT LAW

If you are a California resident and have an established business relationship with us, you have the right to request a list of the categories of personal information (as defined by Shine the Light) disclosed by us to third parties for their own direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of such third parties. To exercise this right, write us at the email or postal address set out in the **How to Contact Us** section below and specify that you are making a "California Shine the Light Request." We will respond to