Empirical Wealth Management
Client Privacy Notice
April 2025

General

Empirical Financial Services, LLC dba Empirical Wealth Management is a registered investment adviser with the Securities and Exchange Commission ("SEC") under the investment Adviser Act of 1940. The SEC requires registered investment advisers to disclose how we treat nonpublic information.

This Privacy Notice ("Notice") describes how Empirical Wealth Management and its affiliates and related entities (collectively, "Empirical," "we," "us," or "our") collect use, disclose, and retain personal information about individuals who interact with us directly (clients, former clients and prospects) and via each website, mobile application, and other online platforms that link to this Policy (collectively, the "Site") and the services available through our Site (collectively, the "Services"). This Policy also describes the rights you may have regarding our processing of your personal information under applicable local law.

We do not disclose any information, including but not limited to, nonpublic information about our clients or former clients to anyone, except as required by law (such as to respond to a subpoena or to prevent fraud), as necessary in order to administer and service clients' accounts, or as authorized by such clients or former clients.

We restrict access to nonpublic information about you to those employees who need to know that information to provide services specific to you. We maintain physical, electronic, and procedural safeguards to guard your nonpublic personal information.

What Information We Collect

The types of personal information we collect and share depend on the products or services provided to you. To conduct regular business, Emprical may collect the following types of personal information:

- Name
- Address
- Social security number
- Passport or driver's license number
- Risk tolerance
- Assets and account balances
- Transaction history
- Tax documents
- Estate planning documents

Customer Identification Program

To assist the government in combating terrorism financing and money laundering activities, federal law mandates that financial institutions obtain, verify, and record information that identifies each individual who opens an account.

When you open an account, Empirical is required to collect the following information from you, including but not limited to, your name, date of birth, address, identification number (i.e., Social Security number, Passport, or other government-issued identification). Corporations, partnerships, trusts, or other legal entities may be required to provide other information such as verification of its principal place of business, employer identification number, certified article of incorporation, government-issued business license, partnership agreement, or a trust agreement.

United States Department of Treasury, Securities and Exchange Commission, NASD, and New York Stock Exchange rules already require you to provide most of this information. These rules also require you to provide additional information like your net worth, annual income, occupation, employer information, investment experience and objectives, and risk tolerance.

Uses and Sharing of Information

All financial companies, including Empirical, need to share clients' personal information to run their everyday business. We collect your personal information, for example, when you open an account, create a financial plan, deposit or withdraw funds, give us your income information and your contact information, among other things. In the section below, we list the reasons we share our clients' personal information; the reasons Empirical chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Empirical share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), provide wealth management advice or respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We do not share
For our affiliates' everyday business purposes— Information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	No	We do not share
For our affiliates to market to you	No	We do not share
For nonaffiliates to market to you	No	We do not share

Additional State Disclosures

You may have certain rights regarding our processing of your personal information under applicable local law. If our processing of your personal information is governed by such laws, the section above provides you with information regarding your rights and our processing of your personal information under applicable local law.

California Residents

Under the CCPA and the CPRA, California residents are granted certain rights over the personal information businesses collect about them. These rights apply to certain categories of sensitive personal information, such as your social security number, driver's license number and financial account information, including account log-on information, we collect and retain in connection with the services that we provide. If applicable, these rights include:

- To request that we disclose personal information we have collected about you and sources;
- To request that we delete your personal information;
- To request that we correct your personal information;
- To request to limit the disclosure or use of your personal information;
- To request that we disclose the business purpose for collecting your personal information; and
- To request that we disclose the categories of your personal information we shared with third-parties and the categories of third-parties with whom we share your information.

If the CCPA/CPRA applies to you and you wish to exercise any of these rights please contact our Compliance Department using the contact information provided below. We may seek further information from you to confirm your identity before we release any personal information. We do not "sell" or "share" your personal information as these terms are defined in the CCPA/CPRA. We will not discriminate against you for exercising any of your CCPA/CPRA rights. We do not "sell" or "share" your personal information as these terms are described in the CCPA/CPRA.

Security

Empirical uses physical, technical, and organizational security measures to comply with federal law designed to safeguard your personal information from unauthorized access or use. These measures include computer safeguards, secured files and buildings. We maintain a Cybersecurity Program to provide awareness and train employees to prevent unauthorized access and data breaches to sensitive client information, including personal, financial, and proprietary information. We restrict access to client nonpublic information to those employees and service providers who are involved with providing products and services to clients. When there is a need to dispose of confidential client information, we require our employees to shred confidential documents. We maintain a password-protected and encrypted client portal for clients to send or receive confidential information. Systems we use to record and use client information are designed to be encrypted and password-protected to further secure client confidentiality. We continue to evaluate our efforts to protect confidential client information and to keep our privacy notice and practices current.

Former Clients

When you are no longer our client, we continue to extend our privacy practices and applicable procedures to personal information even after you cease to use our service as described in this Notice. We continue to treat nonpublic information strictly confidential.

How to Contact Us

If you have any questions or concerns about our privacy practices, please contact our Compliance Department at (800) 923-4307 or by e-mail at compliance@empirical.net.

Changes to Our Privacy Notice

This Notice is subject to revision and changes. We encourage you to visit this page periodically to learn about updates to our privacy practices.