

YOUR PRIVACY

FC ADVISORY, LLC, doing business as **FINANCIAL COACH** and also doing business as **NEW WEALTH PROJECT** (hereinafter collectively referred to as "FCADV"), is committed to maintaining the trust and confidence of our clients. As an investment adviser firm registered with the Securities and Exchange Commission (SEC), FCADV complies with applicable SEC regulations including those which specifically require that we (1) adopt policies and procedures to protect the "non-public personal information" (NPI) of natural person consumers / investors and customers, and (2) disclose to such individuals that FCADV has adopted policies and procedures for protecting NPI.

As best business practice, FCADV also complies with applicable state data breach laws which require that FCADV provide notification to any individual(s) impacted by security breach with the potential to compromise such individual's NPI.

INFORMATION WE COLLECT

FCADV collects information, including NPI, with regard to its clients and prospective clients, such as date of birth, account information, social security number and/or other identification, for the purpose of providing investment advisory services. Such information may be obtained directly from you, and/or from other sources, such as from your investment accounts (e.g., applications or other forms, reports, and statements of transaction), or records we receive from other investment firms, tax preparers, or other professionals that you retain and authorize to provide such information directly to us.

HOW INFORMATION IS USED

Obtaining your information allows us to provide investment advisory services and recommendations better suited to helping you meet your personal financial objectives, and to fulfill our obligations to regulatory and other applicable government bodies to whom FCADV is required to report.

Except in the following circumstances, FCADV does not share client information with any non-affiliated third parties:

As necessary to provide the services you have requested, or to maintain and service your account(s). This includes, with regard to providing certain services, disclosing relevant information to "service providers" contracted by you and/or FCADV as necessary in order for you to receive such services (e.g., information provided to an attorney for the purpose of drafting legal documents, or to companies utilized for transaction processing, performance reporting, and/or account reporting purposes).

To non-affiliated persons upon your request, or as previously identified and/or authorized by you (e.g., information provided to your accountant, attorney, or your "Trusted Contacts", such as Power of Attorney).

As required by regulatory authorities, law enforcement officials, and any others who have jurisdiction over FCADV, such as an auditor responsible for determining FCADV's compliance with industry standards, or as otherwise required or permitted by applicable law, such as to comply with a court order, legal process, or other judicial or investigative proceeding, or to permit auditing of account information.

For our business purposes, to the extent necessary. This includes providing information to FCADV's attorney(s), accountant(s), auditor(s), or others for business-related purposes, such as protecting the confidentiality or security of the financial institution's records against fraud, for institutional risk control purposes, to fulfill or respond to a request received from you or your authorized representative or following a decision to sell or transfer our business or assets, and as otherwise described in this Privacy Policy.

FCADV does not currently have affiliated entities with which it shares and/or uses consumer information received from affiliates, nor do we share NPI with non-affiliated parties in any manner that would require us, with regard to SEC Regulation S-AM, to provide customers with the right to opt-out. Should this change, we will amend our privacy policies and practices accordingly, and comply with such regulations to the extent necessary.

PROTECTING YOUR INFORMATION

FCADV retains records, including those containing NPI, in accordance with SEC record retention requirements, or as otherwise required by applicable state or federal law. Furthermore, to help protect our client's assets, safeguard the proprietary and confidential information of our clients, and prevent unauthorized access to the information utilized and retained by our FCADV, we have adopted policies and procedures, including, but not limited to:

Employee Requirements – Protecting our client's assets and safeguarding the proprietary and confidential information of our clients, the Firm, and its employees is a fundamental responsibility of every FCADV employee. All FCADV employees are bound by professional standards of confidentiality, as further detailed in the Firm's Code of Ethics, and undergo periodic testing, annually at a minimum, with a focus on protecting the confidentiality of information and preventing unauthorized use, access to, and disclosure of such information.

Data Breach Monitoring – All FCADV employees are asked to remain vigilant for, and report upon, any indications that the identities of clients may have been compromised, stolen, or are otherwise at risk.

Safeguarding Measures – FCADV has adopted specific Policies and Procedures with regard to the Safeguarding, Recovery, and Disposal of sensitive information obtained by, and transmitted through, FCADV's devices and systems. These measures include those designed to protect information maintained in digital, electronic format, such as access controls, firewall protections, and encryption policies, and others designed to protect physical, hardcopy material retained at our primary office location in West Chester, PA, such as a locked building further protected by an intruder detection security system. When no longer needed, physical data is disposed of securely, on-site at our West Chester office, with the support of a professional information destruction company.

Further detail can be found within the **Privacy, Information, and Cyber-Security** section of FCADV's Written Policies and Procedures Manual, which you may request at any time and without charge. All such policies and procedures undergo inspection, at least annually, to ensure that measures are in place and currently appropriate with regard to our Firm practices and the latest technology available to FCADV. Any material changes to this Privacy Policy Statement will be communicated promptly to all existing clients and employees.

YOUR RIGHTS

Federal law gives you, the customer, the right to limit some, but not all, sharing of your personal information. **For questions about this Privacy Policy Statement, or to request a copy of FCADV's policies and procedures or other up-to-date information, call us at (484) 887-0452, or email hello@financialcoachgroup.com.**