

## Privacy Policy

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Effective: December 04, 2024

### Our Commitment to You

Penserra Wealth Management, LLC (“Penserra” or the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Penserra (also referred to as “we,” “our,” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Penserra does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discreet and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why do you need to know?

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

|  |                                 |
|--|---------------------------------|
| Driver’s license number                            | Date of birth                   |
| Social security or taxpayer identification number  | Assets and liabilities          |
| Name, address, and phone number[s]                 | Income and expenses             |
| Email address[es]                                  | Investment activity             |
| Account information (including other institutions) | Investment experience and goals |

### What Information do we collect from other sources?

|   |   |
|---|---|
| Custody, brokerage, and advisory agreements   | Account applications and forms                      |
| Other advisory agreements and legal documents | Investment questionnaires and suitability documents |
| Transactional information with us or others   | Other information needed to service the account     |

### How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural, and electronic security measures. These include such safeguards as secure passwords, encrypted file storage, and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Clients’ personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

## How do we share your information?

An RIA shares Clients' personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

| Basis For Sharing   | Do we share? | Can you limit? |
|---|--------------|----------------|
| <p><b>Servicing our Clients</b><br/>We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, and other financial institutions) as necessary for us to provide agreed-upon services to you, consistent with applicable law, including but not limited to processing transactions, general account maintenance, responding to regulators or legal investigations, and credit reporting.</p>                  | Yes          | No             |
| <p><b>Marketing Purposes</b><br/>Penserra does not disclose and does not intend to disclose personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Penserra or the Client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b></p> | No           | Not Shared     |
| <p><b>Authorized Users</b><br/>Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].</p>  | Yes          | Yes            |
| <p><b>Information About Former Clients</b><br/>Penserra does not disclose and does not intend to disclose nonpublic personal information to non-affiliated third parties with respect to persons who are no longer our Clients.</p>   | No           | Not Shared     |

## Geographic-Specific Regulations

|                          |  |
|--------------------------|--|
| <p><b>California</b></p> | <p>In response to a California law, to be conservative, we assume that accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.</p> <p>Californians have the following rights regarding our collection and use of your personal information. We may ask you to provide additional information to verify your request. Californians have the right to request the information regarding the personal information we have collected, sold, or disclosed about you. This Policy explains the following:</p> <ul style="list-style-type: none"> <li>• Categories of personal information collected about you and sources from which collected;</li> <li>• Our purpose for collecting personal information;</li> <li>• Categories of third parties with which the personal information was shared;</li> <li>• Specific pieces of personal information collected about consumers;</li> <li>• Categories of your personal information sold in the preceding 12 months;</li> <li>• Categories of third parties to whom your personal information has been disclosed; and</li> </ul> |
|--------------------------|--|

- Categories of personal information that we disclose about consumers for a business purpose.

If this Policy does not answer your questions, then you have the right to contact us and request further information on each of these topics.

#### **Right to Opt-Out**

Californians have the right to opt out of sharing or disclosure of your Personal Information. If you wish to opt out of the limited data we share with our trusted partners, email [compliance@penserrawealth.com](mailto:compliance@penserrawealth.com) with "Request to Opt-Out of Data Sharing" in the body and subject line of the [compliance@penserrawealth.com](mailto:compliance@penserrawealth.com) email. However, we may be required to keep your information if it is necessary to retain your information to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by you, or a transaction reasonably anticipated within the context of our or one of our affiliate's ongoing business relationships with you, or to otherwise perform a contract we have with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Facilitate solely internal uses that are reasonably aligned with your expectations based on your relationship with us or one of our affiliates.
- Comply with a legal obligation.
- Otherwise, use personal information internally in a lawful manner that is compatible with the context in which it was provided.

#### **Right to Request Deletion**

Californians have the right to request that we delete the personal information we have about you. However, we are not required to delete information if it is necessary to retain your information to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by you, or a transaction reasonably anticipated within the context of our or one of our affiliate's ongoing business relationships with you, or to otherwise perform a contract we have with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- Facilitate solely internal uses that are reasonably aligned with your expectations based on your relationship with us or one of our affiliates.
- Comply with a legal or regulatory obligation.
- Otherwise, use personal information internally in a lawful manner that is compatible with the context in which it was provided.

#### **Contact Us**

You can contact us with questions about this Privacy Notice for California Residents or to exercise your rights as described in this notice.

Email us at [compliance@penserrawealth.com](mailto:compliance@penserrawealth.com) with "Request for California Privacy Information" in the body and subject line of the email.

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|---|---|
| <p><b>Massachusetts</b></p>   | <p>In response to Massachusetts law, the Client must “opt-in” to share nonpublic personal information with non-affiliated third parties before any personal information is disclosed. Client opt-in is obtained through the Client’s execution of authorization forms provided by the third parties, by executing an Information Sharing Authorization Form, or by other written consent by the Client, as appropriate and consistent with applicable laws and regulations.</p>   |
| <p><b>Vermont</b></p>   | <p>In response to Vermont regulation, if we disclose personal information about you to non-affiliated third parties, we will only disclose your name, address, other contact information, and general information about our experience with you.</p>  |
| <p><b>European Economic Area, The United Kingdom, and Switzerland</b></p> | <p>If you reside in the European Economic Area (“EEA”), the United Kingdom (“UK”), or Switzerland, our use of your personal information is governed by the European Union’s (“EU”) General Data Protection Regulation (“GDPR”) or applicable EEA, UK, or Swiss national laws. These grant you particular rights in your personal information, including the right to alter, correct, receive, or delete personal information processed by us, subject to our business interests and any legal requirements we may face here.</p> <p>Those in the EEA, UK, or Switzerland have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA are available here.</p> <p><b>Data Rights and Request</b></p> <p>We respond to all requests we receive from individuals wishing to exercise their data protection rights under applicable data protection laws. To protect your privacy and security, we may need to take reasonable steps to verify your identity before responding to your request.</p> <p>To exercise any of these rights, you may contact us via email at <a href="mailto:compliance@penserrawealth.com">compliance@penserrawealth.com</a>. If we are unable to resolve your complaint, you may contact your country’s data protection authority.</p> <p>You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. The European Commission’s list of Supervisory Authorities is available at <a href="http://www.ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm">www.ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm</a>.</p> <p>If you need further assistance regarding your rights, please contact us at <a href="mailto:compliance@penserrawealth.com">compliance@penserrawealth.com</a>, and we will consider your request in accordance with applicable law. In some cases, our ability to uphold these rights for you may depend upon our obligations to process personal information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.</p> <p><b>Data Transfers to the United States</b></p> <p>We are based in the United States (“U.S.”), and we process and store information in the U.S. Therefore, we and our service providers will store and access your personal information in the U.S. The U.S. may not provide equivalent levels of data protection as enjoyed in your home jurisdiction.</p> <p>It may occur that a third party based in the EU, such as your employer, may need to transfer personal information to us for the purpose of verifying your participation in a class. In such instances, whenever your personal data is transferred to countries outside of the EAA, UK, or Switzerland, we will ensure that at least one</p> |

of the following safeguards is in place:

- The country is one that the European Commission has approved as providing an adequate level of protection for personal data;
- The transfer is subject to a specific derogation in the GDPR or national laws;
- Through the use of the standard contractual clauses as the transfer mechanism when a case-by-case analysis has been performed; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission that give personal data substantially similar protection as in the UE, EEA, or UK.

**How you can access, update, or delete your data**

It is very important that the information we hold about you is accurate and up to date. You can also email us at any time if your personal information changes or you want to opt out of email communication; please see the Opt-Out section above or email us at [compliance@Penserrawealth.com](mailto:compliance@Penserrawealth.com).

**Changes to our Privacy Policy**

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically, we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the sharing of information.

**Any Questions?**

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (800) 456-8850.