

## ***RWA Advisors, LLC - PRIVACY POLICY - 2022***

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The Securities and Exchange Commission, FTC and other regulatory bodies require us to follow certain provisions of the Gramm-Leach-Bliley Act in handling the personal financial information of our customers. This includes the adoption of this RWA Advisors, LLC Privacy Policy, (“Policy”) the initial distribution of the Policy and the annual mailing of the Policy to all our clients. The Policy outlines how and when we would share your non-public personal information with anyone. In a nutshell, we only share your information when we are required to by law or in the process of providing services to you. Other than that, we don't share your information with anyone. This would also apply to any information we collect about you from other sources.

**The RWA Advisors, LLC Privacy Policy has also been adopted by and is applicable to Rubin Wealth Advisors, a DBA (Doing Business As) of RWA Advisors LLC, which is used primarily with our insurance services clients. RWA Advisors, LLC shall also furnish you with an annual update of this Policy each year during the continuation of our relationship.**

### **What is non-public personal information?**

Any personal information that cannot be found in public sources. This generally includes date of birth, social security number, financial account numbers and balances, sources and amounts of income and credit card numbers.

### **Do we sell your personal information?**

No. We do not sell the personal information we have collected about you to anyone.

### **Do we disclose your personal information to third parties?**

We do not disclose any nonpublic personal information about our clients or former clients to anyone, except for the following reasons:

- As require by law. If disclosure is required under law, we will in good faith report personal information. For example – to provide information to regulators or law enforcement authorities.
- To provide services to you with your written permission, we may disclose your information to financial and other service providers to help us process or service your accounts or transactions. Examples of such service providers are: broker/dealers, insurance companies, outside third party custodians such as Charles Schwab & Co., as well as auditors, your CPA and/or attorney. Other than these exceptions, we do not share your personal information with any non-affiliated third party, unless you have asked us specifically to do so.

### **What information do we collect?**

We collect non-public personal information about you from the following sources:

- Information we receive from you on applications, financial and/or estate planning questionnaires or other forms, such as your name, address, social security number, investments, assets and income and other information.
- Information about your transactions with us, our affiliates or others such as your balances, positions and account history.
- Information to let us know which pages of our website you visited so that we can provide better service to you in the future.

**How do we protect your information?**

We restrict access to nonpublic information about you to employees who need to know it in order to provide you with advisory services under the terms of our Advisory Agreement. We maintain physical, electronic and procedural safeguards to guard your nonpublic personal information.

**What if we decide to change its policy of information disclosure in the future?**

You will be notified in advance of the changes. You will have the choice to “opt-out” by calling us at (561)288-1160, sending us an email or leaving us a message on our website at <http://rubinwealthadvisors.com>

**Is there additional information that we are required to make available to you?**

Yes. We are required to annually offer you our required Securities and Exchange Commission disclosures as they appear in SEC Forms ADV-2A, and we are hereby doing so. These forms describe our advisory services, fees, sources of potential conflicts of interest and professional backgrounds of our advisors. Please let us know if you would like us to e-mail you a copy. It is also posted on our website, [www.rubinwealthadvisors.com](http://www.rubinwealthadvisors.com).

**Do we do business with others on your behalf?**

Yes. We do business with many firms which help us provide services and products to our clients. These firms allow us to provide services such as portfolio management, financial reporting, financial and estate planning and an on-line portal to our clients. They also allow us to utilize online data reporting, storage, and backup services. We have consciously chosen different providers to diversify the privacy risk and data loss risk. Each of these providers utilize advanced data security procedures such as 128-bit encryption, dual redundant firewalls, and most use two geographically distinct locations for backups. To make it easy for you we have included whom those companies are, what they do for us and you and a direct link to their latest privacy policies.

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**Adhesion Wealth Advisor Solutions** - Since 1999, Adhesion has been an industry leader in providing sophisticated, customized investment solutions, integrated with practice management tools and outsourced back- and middle- office, to wealth advisory firms. The services they provide include portfolio rebalancing and reconciliation. Their sole interest is to help wealth advisory firms be successful.

<http://www.adhesionwealth.com/integrated-solution/securing-your-data.shtml>

**Blueleaf** - Blueleaf is our account aggregation software with safe, simple, personal financial tracking for our clients. Blueleaf simplifies tracking all your savings and long-term financial goals while making everything you own transparent, understandable, and controllable. It is extremely safe as it only has a reporting function.

<http://www.blueleaf.com/privacy-policy/>

**Docupace Technologies** - Docupace is a state-of-the-art document management and workflow solution which allows us to capture, organize, route and access client information digitally thereby allowing us to be as paperless as possible and at the same time doing right by the environment!

<https://www.docupace.com/security-and-compliance/>

**Dropbox** - Dropbox is a technology company that builds simple, power products for people and business. Currently 500 million people around the world use Dropbox on any device and wherever they go. 1,200,000,00 files are saved on Dropbox every day. We use Dropbox to securely share files with clients.

[https://www.dropbox.com/privacy#business\\_agreement](https://www.dropbox.com/privacy#business_agreement)

**Go Daddy** – Go Daddy hosts our websites. Go Daddy gives us superior reliability when it comes to supplying you with a functioning website 99.9% of the time. They give us the scalability to have any type of website from a small business to corporate or enterprise web space.

<http://www.godaddy.com/Agreements/ShowDoc>

**MoneyGuide** – MoneyGuide is a tool that we use with clients for financial planning. They are an affiliate of Envestnet. Their Privacy Policy governs the manner in which MoneyGuide, Inc. collects, uses, maintains and discloses information collected from users.

<https://www.moneyguidepro.com/ifa/home/privacy>

**Redtail Technology, Inc.** Redtail Technology, Inc. is the leader in Web-Based Client Relationship Management solutions for the financial advisor. Redtail is bringing next-generation technology to the financial advisor to help us better serve our client base. Started in 2003, Redtail is named for a red tail retriever named Tucker.

<http://corporate.redtailtechnology.com/privacy-policy/>

**Riskalyze** - Riskalyze is technology that provides clarity to our clients and allows us to easily ascertain our clients' capacity for investment risk. Riskalyze is used to capture a quantitative measurement of client risk tolerance, in order to meet expectations and quantify suitability for our clients.

<https://www.riskalyze.com/privacy>

**Schwab Advisor Services** - Schwab Advisor Services is what some of our clients view as the "front end" of our company. Schwab Advisor Services custodies most of our client's advisory funds. They also do it for over \$3.1 trillion in client assets, 1.5 million corporate retirement plan participants, 1.1 million banking accounts and 7,000 RIAs served. They provide us back-office client account support and service that allows us to run our business as efficiently as possible.

[http://www.schwab.com/public/schwab/nn/legal\\_compliance/privacy/](http://www.schwab.com/public/schwab/nn/legal_compliance/privacy/)