



## Privacy Policy

Last Updated: September 2024

We are proud of our privacy and confidentiality practices, and we want you to know how we protect your data. This Privacy Policy (“Policy”) identifies the ways Commonwealth Continuum Advisors, LLC (“Continuum”) and its affiliates (“we,” “us,” or “our”) collect, store, use, disclose, and protect your personal information.

### 1. Introduction

Continuum provides investment services to you through its network of investment adviser representatives and agents (“Representatives”). We have always valued the trust our customers place in us and are committed to the responsible management, use, and protection of our customers’ personal information (i.e., information that can be used to identify an individual).

This Policy identifies the ways Continuum collects, stores, uses, discloses, and protects the personal information you provide to us when you use our website, located at [www.continuumria.com](http://www.continuumria.com) (the “Website”), our online services, our mobile applications, our social media pages, and any other product or service that links to this Policy (collectively, our “Services”). If you have entered into a separate agreement with us, that separate agreement shall control, and only those terms within this Policy that do not conflict with such separate agreement shall apply. If you are a Continuum Representative, your separate agreement with us, not this Policy, shall apply to our relationship. This Policy does not cover information we receive from third parties. Please note that depending on your relationship with us, other privacy policies may apply in addition to this Policy, such as when you apply for or use financial products or services. By accessing the Services, you agree to the practices regarding your personal information outlined in this Policy. Each time you use the Services, the current version of this Policy will apply. Accordingly, when you use the Services, you should check the date that appears at the top of this document and review any changes since you last looked at the Policy.

**Please note:** This Policy applies to the websites and online services of Continuum and not to those of Continuum Representatives. For details about their privacy practices, please contact your Representative.

### 2. Information We Collect About You

#### *Information You Provide to Us*

We collect personal information that you voluntarily provide to us when you use our Services; for example, you may provide us with your contact information, such as your first name and last name, email address, phone number, location, information about your current firm, your approximate assets under management, the content of your communication, or other personal information, when you choose to submit such information to us through email, an online form, or other method (e.g., submitting an information request).

We also collect certain personal information from individuals who are exploring a relationship with us or seeking to learn more about Continuum. For example, an individual may inquire about becoming an investor, advisor, or agent with Continuum. The types of personal information that we collect will depend upon the specific type of relationship you have or seek with us.

If you interact with us on social media, we may collect your social media profile information, your communications with us, and your communications and posts on our social media pages and forums. If you use any of our chat or communication features, we will collect the content of your communications through such features.

#### *Continuum Online Services*

We collect personal information when you use or enroll in Continuum's online services, including our mobile applications, such as your name, address, email address, phone number, social security number, and Internet Protocol (IP) address and/or domain, as well as other data you may provide us in connection with your use of our online services, such as information related to a financial product or service, including, but not limited to, investment preferences, demographic information, citizenship information, date of birth, and financial information. This may include your financial account information, account summaries and balances, account performance, and account activity, as well as statements, documents, and reports associated with your account. We may also receive your contact information from a third-party website regarding requests about financial products and services on that website. For Continuum clients, we will ask you for contact information to provide you with secure online account access. We may collect and maintain information about your account, online account activity, online services, products requested, and usage of our Website and Services. If you use messaging functions through our mobile application, we collect the content of any message that you send through the mobile application. Communications among users that occur outside our mobile application and Services are not governed by this Policy.

Users of Continuum's online services may also provide us information about their professional advisors, such as their accountant, tax advisor, or attorney, and information about family members and other third parties, such as spouses, children, and beneficiaries.

#### *Information We Automatically Collect*

When you use our Services, we automatically receive and collect information from your device. This information includes the following:

- Information about your device, such as the operating system, hardware, system version, IP address, device ID, and device language
- The specific actions you take when you use our Services, including, but not limited to, the pages and screens you view or visit, search terms you enter, and how you interact with our Services
- The time, frequency, connection type, and duration of your use of our Services
- Information regarding your interaction with email messages; for example, whether you opened, clicked, or forwarded the email message
- Identifiers associated with cookies or other technologies that may uniquely identify your device or browser (as further described below)
- Pages you visited before or after navigating to our Services

#### *Employment*

If we have collected your personal information through Commonwealth's "Careers" page in response to a job opening, you are giving us permission to use and retain your information for the purpose of evaluating your application for employment for the specific position you applied to, as well as other roles at Continuum. This personal information may be processed and stored by a third-party talent tracking solution provider as well as with vendors, consultants, and other service providers who need access to such information to carry out work relating to the recruitment process on our behalf.

### *Aggregate Information Collected*

Aggregate information is information that does not identify you. It may be collected when you use our Services, independent of any information you voluntarily enter. In addition, we may use one or more processes to de-identify information that contains personal information, such that only aggregate information remains. We may collect, use, store, and transfer aggregate information without restriction.

## **3. Use and Sharing of Your Personal Information**

### *How We Use Your Information*

In general, we collect information and personal information from you so we can provide our Services, operate our business, and provide information you request from us. This includes, but is not limited to, the following:

- Provide information, products, or services you request
- Verify your identity when accessing our Services
- Compare information for accuracy and verify our records
- Detect and prevent fraud, security or technical issues, or criminal activities
- Evaluate you for an employment position with us (if you apply)
- Operate, improve, maintain, and protect our Services
- Provide technical and other support
- Send updates, marketing communications, and other information about Continuum, Representatives, and Services
- Send you notices and alerts
- Conduct research and analytics, monitoring and analyzing trends and usage
- Contact you and respond to your inquiries
- Send you email newsletters
- Register you for an account in our online services
- Enhance or improve user experience, our business, and our Services, including the safety and security thereof
- Personalize our Services to you
- As necessary to comply with any applicable law, regulation, subpoena, legal process, or governmental request
- Enforce contracts, our Terms of Service, and User Agreement(s), including investigation of potential violations thereof
- Protect against harm to the rights, property, or safety of Continuum, our users, or the public as required or permitted by law

### *How We Share Your Information*

We do not rent or sell your personal information.

We may share some of your personal information with third parties that perform services for us. We may also transfer your personal information to third parties under the following circumstances:

- i. To comply with a legal requirement, law, subpoena, judicial proceeding, court order, governmental request, or legal process
- ii. To investigate a possible crime, such as fraud or identity theft
- iii. In connection with the sale, purchase, merger, asset sale, financing, reorganization, liquidation, or dissolution of Continuum, including the evaluation thereof

- iv. When we believe it is necessary to protect the rights, property, or safety of Continuum or other persons
- v. As otherwise required or permitted by law, including any contractual obligations of Continuum

Except as provided in this Policy, we share your personal information at your direction or when we have your consent to do so. If, for example, you connect our Services to third-party software or services, such as your accounting or tax software provider, we will share your information with such provider. If you use our online services, your Representative may have access to your online services account information.

#### **4. Storage and Protection of Your Personal Information**

To protect the privacy and security of personal information, we use reasonable administrative, technical, physical, and operational safeguards. Given the open nature of the internet, however, your personal information may be transmitted without security measures over networks connecting you to Continuum's systems and may be accessed and used by parties other than those for whom the data is intended. To safeguard against unauthorized access, Continuum employs secure network architectures, such as encryption techniques, firewall barriers, authentication protocols, and intrusion detection. Despite these safeguards and our additional efforts to secure your personal information, we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your personal information.

#### **5. Cookies and Analytics**

A cookie is a text file stored by a web browser on a user's machine. Websites use cookies for authentication, storing website/information preferences and other browsing information that can help the web browser while accessing web servers. Continuum uses cookies and similar technologies to track usage of the Website and to address security issues. We may also use cookies to store your preferences relating to the use of our Website. If you do not want to allow our Website to place a cookie on your computer, you can change your browser's settings to reject cookies; however, this may affect your experience with certain features of our Website, and some features and functions may not be available. Although we do our best to honor the privacy preferences of our visitors, we are not able to respond to Do Not Track signals from your browser.

Our Website uses certain analytics tools, such as Google Analytics and Account Engagement, to provide insight into our Website and to improve the relevance of advertisements you receive. You may be able to opt out of these analytics tools by visiting the applicable website. If you would like to opt out of Google Analytics, for example, please visit <https://tools.google.com/dlpage/gaoptout>.

#### **6. Third-Party Websites and Social Media**

The Services may contain hyperlinks to websites operated by third parties, which may include social media features, such as Facebook, LinkedIn, YouTube, Instagram, and X (Twitter) buttons or links. We provide such hyperlinks for your reference and convenience only. We do not control such websites and are not responsible for their content or the privacy or other practices of such websites. It is up to you to read and fully understand their privacy policies. Our inclusion of hyperlinks to such websites does not imply any endorsement of the material on such websites or any association with their operators. If you are submitting information to any such third party through our Services, you should review and understand that party's applicable policies, including their privacy policies, before providing your information to the third party.

## **7. Children's Privacy**

Our Services are not intended for use by children younger than 13, and we do not knowingly collect personal information from children younger than 13.

## **8. Updating and Correcting Your Personal Information; Opt Out**

If your personal information or account information is incomplete, inaccurate, or outdated, please contact your Representative (if applicable) or Continuum at 833.959.0118.

If you no longer wish to receive our marketing and promotional communications, you may opt out by following the instructions included in each communication.

## **9. Questions About Your Privacy**

Please email [cfnprivacyoffice@commonwealth.com](mailto:cfnprivacyoffice@commonwealth.com) if you have questions or concerns regarding our use of your personal information or this Policy.

## **10. Updates to This Online Privacy Policy**

This Policy is subject to change without notice and should be reviewed each time you use our Services. You should also check the date of this Policy to see whether changes have been made since the previous version. Changes to this Policy take effect when the revised Policy is posted. You accept the revised Policy when you use the Services following any changes.