## $\begin{array}{c} {\rm Retirement}\\ {\rm Wealth}\\ {\bf \Lambda dvisors}\end{array}$

## **PRIVACY POLICY**

By nature of the profession, Investment Advisory and Wealth Management Services routinely involve the gathering and maintenance of highly sensitive and private client information. We take this fact very seriously, and have set forth a Privacy Policy to ensure the complete security of our clients' private information.

The Securities and Exchange Commission requires us by law to provide our clients with our most current Privacy Policy on an annual basis. In addition to the annual mailing to clients, we present here our most recent Privacy Policy for your reference.

Retirement Wealth Advisors, Inc. ("RWA") is an investment adviser registered with the Securities and Exchange Commission under the Investment Advisers Act of 1940, as amended. RWA maintains the following Privacy Policy in order to comply with the SEC's Privacy of Consumer Financial Information rule (commonly known as "Regulation S-P").

RWA's Privacy Policy applies to any individual to whom RWA renders financial services or has done so in the past (in other words, all clients of RWA). It covers any nonpublic personal information obtained from clients, as well as from other firms in connection with providing such services. The categories of nonpublic personal information that are collected depend on the scope of the client engagement, and may include descriptions of clients, their Social Security numbers and birthdates, contact information, their income and asset information, transactions between clients and third parties, other financial information, and health information.

All nonpublic personal information is treated as strictly confidential and is not disclosed except to employees for the purpose of carrying out their responsibilities and to affiliated and nonaffiliated firms necessary to affect and administer custodial, brokerage, financial planning, legal, accounting, insurance or similar services requested and authorized by the client. Federal and state regulators also may review client records as permitted under law. RWA requires that our affiliates protect and restrict the use of client information to the same extent as RWA. Several practices are presently in place to ensure private client information is secured from public access:

Secured Paper Files: Filing cabinets are locked outside of regular business hours. Any papers to be disposed which contain client information are shredded. RWA's site of business is also securely locked and electronically armed for fire and theft outside of regular business hours.

Secured Electronic Files and Databases: RWA's computer system consists of a peer-to-peer network including a server, which stores all data related to client activities. All RWA computers are secured by a password system and all workstations are logged-off outside of regular business hours. Any electronic information accessible through the Internet is guarded by a secure firewall, and all RWA computers are regularly scanned for viruses. RWA backs-up all electronic data essential to its operations on a daily basis, with the prior day's backup maintained at a remote location in case of disaster.

## **Secured Client Communications**

E-mail: From time to time, RWA will correspond with clients regarding private matters via electronic mail. RWA takes the precaution of verifying all client e-mail addresses, and limiting the content of communications to exclude sensitive elements such as account numbers, Tax ID numbers, and the like, unless authorized by the client. A Disclosure is included with every client e-mail which addresses any persons who may receive the message in error, along with instructions to contact our office and properly dispose of the data. E-mail communications to third parties which relate to our clients are conducted only as necessary to fulfill the obligations of the firm; however, no personal information pertaining specifically to our clients is shared with third parties without the expressed consent of the client.

Phone: Client communications by phone are a daily task, and in situations where RWA initiates a call and reaches voicemail, the Policy is to limit the content of information to exclude dollar amounts, account numbers, and any other sensitive information, unless authorized by the client. Conversations occurring with third parties related to our client situations are conducted only as necessary to fulfill the obligations of the firm; however, no personal information pertaining to clients is shared with third parties without the expressed consent of the client.

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Regular Mail: It is RWA's policy to never mail personal and sensitive information regarding a client other than to the address kept on record at RWA, without the client's expressed instruction.

In addition to these measures, RWA and its employees avoid storing nonpublic personal information in plain view in areas where it may be seen by third parties or discussing such information in public places where it may be overheard. RWA routinely reviews these practices to ensure the confidentiality, security and integrity of its nonpublic personal information.

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