

## **Introduction**

Johndrow Wealth Management delivers a variety of financial products and services to you through our network of insurance agents, our broker dealer (Commonwealth), certified public accountants, attorneys, and other related professionals. We have always valued the trust our customers have placed in us and are committed to the responsible management, use, and protection of our customers' personal data. We are proud of our privacy and confidentiality practices, and we want you to know how we protect your data.

This Online Privacy Policy identifies the ways Johndrow Wealth Managements and its affiliates collect, store, use, disclose, and protect your personal data. Personal data, also known as personal information, personally identifiable information (PII), or sensitive personal information (SPI), is any information that can identify a person.

You agree to the practices regarding your personal data outlined in this policy when you use Johndrow Wealth Management's services and/or investment products.

## **Data We Collect About You**

We may collect data when you use Johndrow Wealth Management's website or online services, including some types of personal data. Examples of personal data include your name, address, email address, telephone number, social security number, and internet protocol (IP) address and/or domain, as well as other data you may provide us related to a financial product or service; these include, but are not limited to, investment preferences, demographic information, or financial information. We may also receive information in the form of third party cookies which contain information about sites that you have previously visited, social networking data, and other non-personally identifiable information about your interactions with our site. We may collect and maintain information about your account, online account activity, data submitted by you through forms, and usage of our website and associated applications.

## **Use/Sharing of Your Personal Data**

We will use your personal data to provide information, products, or services you request in Johndrow Wealth Management's online services; to verify your identity when accessing these services; to compare information for accuracy and verify our records; or to detect and prevent fraud or other criminal activities. We may share some of your personal data with other entities that perform services for Johndrow Wealth Management and are authorized to use your personal data to support our business operations. We may also share some of your personal data as permitted or required by law or as authorized by you. We never sell your personal data for financial gain.

## **Storage/Protection of Your Personal Data**

To protect the privacy and security of personal data, we have designed and maintained administrative, technical, physical, and operational safeguards. Given the open nature of the internet, however, your personal data may be transmitted without security measures over networks connecting you to Johndrow Wealth Management's systems and may be accessed and used by parties other than those for whom the data is intended. To safeguard against unauthorized access, Johndrow Wealth Management employs secure network architectures, such as encryption techniques, firewall barriers, authentication protocols, and intrusion detection.

## **Cookies**

A cookie is a text file that is 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. Johndrow Wealth Management 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 deny cookies; however, this may affect your experience with certain features of our website. Our websites do not respond differently when accessed by a browser that uses a do-not-track signal or similar mechanism.

## **Social Media**

We provide additional information about Johndrow Wealth Management's products and services on our social media sites such as Facebook, LinkedIn, Instagram, and Twitter. Information shared on these social media sites is accessible to all participants; therefore, you should never post any personal data.

## **Personal Data on Children**

We respect the privacy of children; therefore, we do not invite children to visit Johndrow Wealth Management's online services nor do we intentionally collect or use personal data from children under the age of 13. For more information on the Children's Online Privacy Protection Act (COPPA), please visit the Federal Trade Commission website at [www.ftc.gov](http://www.ftc.gov).

## **Updating/Correcting Your Personal Data**

If your personal data or account information is incomplete, inaccurate, or outdated, please contact your financial advisor or Johndrow Wealth Management at 860.321.7261

## **Questions About Your Privacy**

Please email us at [info@johndrowwealth.com](mailto:info@johndrowwealth.com) if you have any questions or concerns regarding this policy.

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

This policy is subject to change and should be reviewed periodically. Changes to this policy will go into effect when the revised policy is posted to our websites. You accept the revised policy when you choose to use Johndrow Wealth Management's online services following these changes.