



## PRIVACY POLICY NOTICE

### FACTS

#### WHAT DOES RIGHTOAK ASSET MANAGEMENT LLC“ROAM” DO WITH YOUR PERSONAL INFORMATION?

##### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

##### What?

The types of personal information we collect and share depends on the product or service you have with us. This information can include, but is not limited to:

- Social Security number and income;
- Assets and transaction history; and
- Investment experience and risk tolerance.

When you are *no longer* our client, we continue to share your information as described in this notice.

##### How?

All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons ROAM chooses to share and whether you can limit this sharing.

| Reasons we can share your personal information   | Does ROAM Share? | Can you limit this sharing? |
|--|------------------|-----------------------------|
| <b>For our everyday business purposes</b> —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | YES              | NO                          |
| <b>For our marketing purposes</b> —to offer our products and services to you   | YES              | YES                         |
| <b>For joint marketing with other financial companies</b>  | NO               | We do not share             |
| <b>For text messaging purposes</b> – To schedule meetings or appointment reminders   | NO               | We do not share             |
| <b>For our affiliates' everyday business purposes</b> —information about your transactions and experiences   | NO               | We do not share             |
| <b>For our affiliates to market to you</b>   | NO               | We do not share             |
| <b>For non-affiliates to market to you</b>   | NO               | We do not share             |
| <b>For third-party access</b>  | NO               | We do not share             |

|                             |   |
|-----------------------------|---|
| <b>To limit our sharing</b> | <b>Please note:</b> If you are a new Client, we can begin sharing your information upon execution of an agreement with ROAM. When you are no longer our client, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing. By executing an Investment Advisory Agreement with ROAM, the Client agrees to “opt-in” to this privacy policy. |
| <b>Questions?</b>           | Call: 517-306-4884  |

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| Who we are                           |      |
|--------------------------------------|------|
| <b>Who is providing this notice?</b> | ROAM |

## SMS Privacy Policy

ROAM values your privacy. By subscribing to our SMS notification service, you agree to this privacy policy.

|                           |   |
|---------------------------|---|
| <b>Data Collection</b>    | <ul style="list-style-type: none"> <li>■ We collect your phone number and name for SMS mobile messaging through the execution of the Discretionary Agreement.</li> </ul>  |
| <b>Date Usage</b>         | <ul style="list-style-type: none"> <li>■ Your data is used solely for sending SMS messages This includes SMS messages for appointment scheduling or appointment reminders.</li> </ul>   |
| <b>Date Security</b>      | <p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <ul style="list-style-type: none"> <li>■ We take reasonable steps to ensure the confidentiality of client information shared via text messages. However, clients are reminded to avoid including sensitive personal or financial information, such as account numbers or Social Security numbers, in text messages.</li> <li>■ We do not share any individual's consent to receive SMS from ROAM with third parties. We do not share phone numbers for SMS purposes or affiliate marketing.</li> </ul> |
| <b>Date Retention</b>     | <ul style="list-style-type: none"> <li>■ We retain your contact data for the duration of your enrollment. You may request deletion at any time.</li> </ul>  |
| <b>Opt Out</b>            | <ul style="list-style-type: none"> <li>■ Reply STOP to any message to unsubscribe.</li> </ul>   |
| <b>Non-Sharing Clause</b> | <ul style="list-style-type: none"> <li>■ We do not share your information with third parties for marketing purposes. Your information is only shared with our SMS provider for secure messaging.</li> </ul>   |

## What we do

|   |   |
|---|---|
| <b>How does ROAM protect my personal information?</b> | To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. |
|---|---|

|  |   |
|--|---|
| How does ROAM collect my personal information? | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ open an account or give us contact information</li> <li>■ enter into an investment adviser contract or give us your income information</li> <li>■ tell us about your investment or retirement portfolio</li> </ul> <p>We also collect your personal information from other companies.</p> <p>To ensure compliance and protect client information, all text message communications are conducted using firm-approved, secure communication platforms that are monitored and archived in accordance with regulatory requirements.</p> |
| Why can't I limit all sharing?                 | <p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for non-affiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>   |

| Definitions & Terms |   |
|---------------------|---|
| Affiliates          | <p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <b><i>No mobile information including Personally Identifiable Information (PII) or SMS consent will be shared with third parties/affiliates for marketing/promotional purposes.</i></b></li> </ul>  |
| Non-Affiliates      | <p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <b><i>No mobile information including Personally Identifiable Information (PII) or SMS consent will be shared with third parties/non-affiliates for marketing/promotional purposes.</i></b></li> </ul>  |
| Third-Party Access  | <p>Non-affiliated companies are third-party entities that are not under common ownership or control with ROAM and do not share a corporate relationship. In the context of SMS communications, these companies may include SMS gateway providers, mobile carriers, third-party messaging platforms, and vendors that support multi-factor authentication (MFA). While these entities may transmit, process, or store SMS messages on behalf of the adviser, they operate independently and are not affiliated with the RIA.</p> <ul style="list-style-type: none"> <li>■ <b><i>We do not share your information with third parties for marketing purposes. Your information is only shared with our SMS provider for secure messaging.</i></b></li> </ul> |
| Joint Marketing     | <p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <b><i>No mobile information including Personally Identifiable Information (PII) or SMS consent will be shared for joint marketing/promotional purposes.</i></b></li> </ul>   |

| Other Important Information  |
|--|
| <p>By signing ROAM Agreement, I acknowledge that I have fully read and understand this Privacy Policy and opt-in as outlined above. I understand that if I have any questions or concerns about this policy, it is my responsibility to discuss this with my financial professional.</p> |

### SMS Terms of Service

By opting into SMS through the Discretionary Agreement, you are agreeing to receive SMS messages from ROAM Inc.. This includes SMS messages for appointment scheduling or appointment reminders. Message frequency varies. Message and data rates may apply. See privacy policy [\[LINK TO PDF – FULL URL ADDRESS\]](#). Message HELP for help. Reply STOP to any message to opt out. We reserve the right to revise this policy from time to time without prior notice. You will be notified of any material changes in Our Privacy Policy either by email or by a conspicuous posting on our website:  
[www.rightoakassetmanagement.com](http://www.rightoakassetmanagement.com)