

**FACTS**

**WHAT DOES ADCM, LLC (“ADCM”) 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 depend on the product or service you have with us. The information can include:

- Social Security number and account balances
- Transaction history and risk tolerance
- Retirement assets and wire transfer instructions

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

**How?**

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

Reasons we can share your personal information	Does ADCM 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 don’t share
<b>For our affiliates’ everyday business purposes</b> – information about your transactions and experiences	YES	NO
<b>For our affiliates’ everyday business purposes</b> – information about your creditworthiness	NO	We don’t share
<b>For non-affiliates to market to you</b>	NO	We don’t share

If you would like to limit our sharing of your personal information or if you have questions, please email us at [ops@investwithwillow.com](mailto:ops@investwithwillow.com)

## Who we are

<b>Who is providing this notice?</b>	ADCM, LLC DBA Willow
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## What we do

<b>How does ADCM protect my personal information?</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> <p>All employees are subject to a strict employment policy regarding confidentiality of our customers' information.</p>
<b>How does ADCM collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ open an account or enter into an investment advisory contract</li> <li>▪ tell us where to send the money</li> <li>▪ give us your contact information</li> <li>▪ seek advice about your investments</li> </ul>
<b>Why can't I limit all sharing?</b>	<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

<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>ADCM, LLC DBA Willow and The Economic Intuitive are affiliates</i></li> </ul>
<b>Non-affiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>ADCM's nonaffiliated business partners include qualified custodians holding client assets, client reporting and portfolio management vendors and other sub-processors</i></li> </ul>
<b>Joint marketing</b>	<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>▪ <i>ADCM doesn't jointly market</i></li> </ul>

## Other important information

You may have privacy protections under applicable state laws, including those for California, Virginia and Colorado residents. To the extent the state laws apply, we will adhere with them when we share information about you, and in some cases may be limited by you.

**California Residents:** The California Information Privacy Act ("CCPA") provides additional protections to control whether we share some of your personal information. In accordance with California law, we will not share information we collect about California resident with outside companies, except as permitted by law, such as with the consent of the customer or to service a customer's accounts.