

MWM ADVISORY GROUP, LLC

PRIVACY POLICY (UPDATED 2026)

Privacy Policy

Your privacy is important to us. This Privacy Policy explains how we collect, use, share, and protect your personal information in connection with the advisory services we provide. We maintain administrative, technical, and physical safeguards designed to meet applicable federal and state laws, including Regulation S-P, Regulation S-ID, and state consumer-privacy requirements.

Information We Collect

We collect nonpublic personal information (“Personal Information”) necessary to provide investment advisory services and to operate our business. This may include:

- Information you provide in applications, onboarding forms, consultations, or other documents. This includes personal and household details such as financial goals, income, spending patterns, investment objectives, account statements, tax documentation, estate-planning information, and similar data.
- Identifying information such as your name, date of birth, address, email address, phone number, Social Security number, and government-issued identification numbers.
- Information about transactions you conduct with us or with third parties on your behalf, including custodians, broker-dealers, portfolio managers, and product sponsors.
- Information from consumer or credit reporting agencies, verification services, or third-party data sources used to fulfill regulatory or service obligations.
- Information automatically collected when using our digital services (such as IP address, device identifiers, and usage analytics), where permitted by law.

How We Use Your Information

We use Personal Information to:

- Provide investment advisory and financial planning services
- Open, maintain, and service accounts
- Meet regulatory, compliance, and audit requirements
- Prevent fraud, identity theft, and unauthorized access
- Communicate with you about accounts, transactions, and services
- Operate, secure, and enhance our systems and business functions

We do not sell Personal Information.

Information We Share

We disclose Personal Information only as permitted or required by law, including:

- Service providers necessary to deliver our advisory and operational services (custodians, broker-dealers, technology platforms, independent managers, and administrative vendors). These providers must protect your information and use it solely for our business purposes.
- Professional advisers and regulators assessing compliance, including auditors, attorneys, and regulatory authorities.
- Government agencies or third parties as needed to comply with legal obligations, investigations, or to protect against fraud, security threats, or unlawful activity.

Information We Share With Affiliated Entities

We may share Personal Information with our affiliates to support advisory services, operational needs, or account servicing. Current affiliates include:

- **Murphy Wealth Management**
- **Charles Schwab** (custodian)
- **Circle Black** (adviser/client secure platform)
- **Vise AI Advisors** (limited-discretion sub-adviser)

MWM ADVISORY GROUP, LLC

PRIVACY POLICY (UPDATED 2026)

Affiliates are required to protect your information and use it only for permitted purposes.

Your Privacy Rights (State-Specific)

Depending on your state of residence, you may have rights regarding your Personal Information, including the right to:

- Access the Personal Information we maintain about you
- Request correction of inaccurate Personal Information
- Request deletion of certain Personal Information, subject to legal exceptions
- Opt out of certain data-sharing practices where applicable
- Receive a portable copy of certain information

When applicable, we will verify your identity and respond in accordance with state law.

Security of Your Information

We restrict access to Personal Information to authorized personnel with a legitimate business need. We maintain administrative, technical, and physical safeguards designed to protect Personal Information from unauthorized access, use, or disclosure.

Incident Response and Breach Notification

We maintain a written incident-response program in accordance with Regulation S-P as amended. If a security incident results in unauthorized access to your sensitive Personal Information, we will notify you in compliance with federal and state breach-notification requirements.

Former Clients

If you close your account(s) or become an inactive client, we continue to protect and handle your Personal Information as described in this Privacy Policy.

Updates to This Privacy Policy

We may update this Privacy Policy periodically. If we make material changes affecting how we use or share Personal Information, we will provide written notice. Where applicable, you may have the right to limit or opt out of certain disclosures.

Questions

For questions about this Privacy Policy or how we protect your Personal Information, please contact our main office at 219-510-5069.