



## **Privacy Policy for POWWOW, LLC As of January 4, 2024**

POWWOW, LLC recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. And we will not sell your information.

POWWOW, LLC will not disclose your personal information to anyone unless it is required by law or at your direction. POWWOW, LLC follows an “opt-in” policy as required by Massachusetts General Laws. When becoming a client, you will be offered an Information Disclosure Authorization to document your preferences, which can be changed at any time. And POWWOW, LLC will provide the most recent privacy policy to all clients annually.

We want our clients to understand what information we collect, how we use it, and how we protect your personal information.

### Why We Collect Your Information

We gather information about you so that we can:

- Help design and implement the investment and planning related services we provide you; and
- Comply with the Federal and State laws and regulations that govern us.

### What Information We Collect and Maintain

We may collect the following types of “nonpublic personal information” about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information.
- Information that we generate to service your financial needs.
- Information that we may receive from third parties with respect to your financial profile.



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### What Information We Disclose

We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. For example, in order for us to provide planning or investment management services to you, we may disclose your personal information in limited circumstances to various service providers, such as our client relationship management software or independent contractors hired by POWWOW, LLC.

Otherwise, POWWOW, LLC will not disclose any personal information about you or your account(s) unless one of the following conditions is met:

- We have written consent, such as the Information Disclosure Authorization Form; or
- We have verbal consent; or
- We have documentation that the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient

To add, change, or remove disclosure permissions, please notify Quentara Costa to fill out a new Information Disclosure Form.

Arrangements with companies or independent contractors not affiliated with POWWOW, LLC will be subject to confidentiality agreements.

### How We Protect Your Personal Information

Privacy has always been important to POWWOW, LLC. We restrict and limit access to client information only to those who need to carry out their business functions. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information, which includes updating and implementing a data security policy.