

# **Online Privacy Policy**

#### **1. Introduction**

Shamrock Wealth Management distributes a variety of financial products and services to you. 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 Shamrock Wealth Management 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 Shamrock Wealth Management's online services.

# 2. Data We Collect About You

We may collect data when you use or enroll in Shamrock Wealth Management's 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 your contact information from a third-party website regarding requests about financial products and services on that website. For Shamrock Wealth Management clients, we will ask you for contact information to provide you with secure online account access. We may collect and maintain information about your account, online account activity, online services, products requested, and usage of our website and applications.

## 3. Use/Sharing of Your Personal Data

We will use your personal data to provide information, products, or services you request in Shamrock 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 Shamrock 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.

## 4. Storage/Protection of Your Personal Data

To protect the privacy and security of personal data, we have designed and maintain 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 Shamrock 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, Shamrock Wealth Management employs secure network architectures, such as encryption techniques, firewall barriers, authentication protocols, and intrusion detection.

## 5. 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. Shamrock 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.

## 6. Social Media

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

## 7. Personal Data on Children

We respect the privacy of children; therefore, we do not invite children to visit Shamrock 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 <a href="http://www.ftc.gov">www.ftc.gov</a>.

#### 8. Updating/Correcting Your Personal Data

If your personal data or account information is incomplete, inaccurate, or outdated, please contact your financial advisor or Shamrock Wealth Management at 651.317.4330.

# 9. Questions About Your Privacy

Please email us at info@shamrockwm.com if you have any questions or concerns regarding this policy.

## 10. 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 Shamrock Wealth Management's online services following these changes.