Sage Advisory Services, Ltd. Co.

Privacy Policy Notice

Our Promise to You

As a client of Sage, you share both personal and financial information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information. We value your trust and encourage you to take some time to read this Privacy Policy carefully. This Privacy Policy applies to all the products, services and websites offered by Sage. We refer to those products, services and websites collectively as the "Services" in this Privacy Policy. By accessing and using the Services, or any part thereof, you agree that you have read and understand this Privacy Policy, and that, in exchange for access to the Services, you accept and consent to the privacy practices (and any uses and disclosures of information about you) that are described in this Privacy Policy.

Information Provided by Clients

In the normal course of doing business, we typically obtain the following non-public personal information about our clients:

- Personal information of our clients' identity such as name, address and Social Security number;
- Information about securities transactions effected by us; and
- Client financial information such as net-worth, assets, income, bank account information and account balances.

We rely on the following lawful grounds to process your personal data: (a) it is necessary for the performance of a contract with you; (b) our or a third party's legitimate business interest; or (c) your consent. We retain personal information for as long as reasonably necessary for the purposes for which it was collected. In some circumstances, we may story personal information for longer periods of time as necessary to comply with legal, regulatory, tax, accounting or technical requirements. Our retention periods are based on the quantity, type, and sensitivity of the personal information, the potential risk of unauthorized use or disclosure, and applicable legal requirements.

How We Manage and Protect Your Personal Information

Sage does not sell information about current or former clients to third parties, nor is it our practice to disclose such information to third parties unless requested or permitted to do so by a client or client representative or, if necessary, to process a transaction, service an account or as permitted by law. We may, however, share information with outside companies that perform administrative services for us. However, our arrangements with these service providers require them to treat your information as confidential.

Sage safeguards customer information according to an established information security program which includes policies addressing the acceptable use and access to confidential business information and personal information which may be contained in Sage's information systems. Sage maintains physical, electronic and procedural safeguards reasonably

designed to guard personal information provided to us from loss, misuse or unauthorized access, disclosure, alteration or destruction.

Notice to California Residents

The California Consumer Privacy Act ("CCPA") provides California residents with rights to receive certain disclosures regarding the collection, use and sharing of "Personal Information," as well as rights to know, access, delete and limit sharing of Personal Information. Due to the nature of our Services, much of the information we collect is exempt from the CCPA because it is covered by federal or state financial and/or privacy laws.

Client Notifications & Modifications

Sage may update, amend, revise or otherwise change this Privacy Policy from time to time. We will post any changes on our website and send notification to our clients. Each version of the Privacy Policy will be identified at the top of the page by its effective date. Continued use of our website or services constitutes your acceptance of our then-effective Privacy Policy. We are required by law to annually provide a notice describing our Privacy Policy. Please do not hesitate to contact us with questions about this notice.