

What does GVCM 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. This information may include:

- Social Security Number and Date of Birth.
- Income, Net worth and Employment.
- Investment Experience, Objectives and Risk Tolerance.
- Account Transaction Information.

How? All financial companies need to share customers' and participants' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' or participants' personal information; the reasons they choose to share; and whether you can limit this sharing.

Reasons we can share your personal information.	Does GVCM share?	Can you limit this sharing?
For our everyday business purposes: Such as processing your transactions, maintaining your capital account(s), responding to court orders and legal investigation, or reporting to credit bureaus.	Yes	No
For our marketing purposes: To offer our products and services to you	Yes	No
For joint marketing with other financial companies.	No	We do not share.
For our affiliates' everyday business purposes: Information about your transactions and experiences.	Yes	No
For our affiliates' everyday business purposes: Information about your creditworthiness.	We do not collect.	We do not collect.
For our affiliates to market to you	No	We do not share.
For non-affiliates to market to you	No	We do not share.

To limit our sharing: GVCM shares personal information as described in the table above. We do not share your personal information for joint marketing with other financial companies, for affiliates to market to you, or for non-affiliates to market to you.

Please note: If you are a new client, we can begin sharing your information thirty (30) days from the date we sent this notice. When you are no longer a client, we continue to protect your personal information and may share it as described in this notice, as permitted or required by law. Questions? Call 262.650.1030.

How does GVCN protect my personal information? To protect your personal information from unauthorized access and use, GVCN maintains physical, electronic, and procedural safeguards designed to comply with applicable federal law. We restrict access to personal information to personnel who need that information to perform their responsibilities. We maintain written information security policies and procedures reasonably designed to protect the security and confidentiality of customer information. We also maintain incident response procedures designed to detect, respond to, and recover from unauthorized access to or use of customer information and to provide notifications required by applicable law.

Retention and Disposal of Information. We retain personal information for the periods necessary to satisfy applicable legal, regulatory, and business requirements. When records containing personal information are eligible for disposal, we take reasonable measures to protect against unauthorized access to or use of that information in connection with its disposal.

How does GVCN collect my personal information?

We collect your personal information, for example, when you:

- Open an account.
- Make deposits or withdrawals from your account.
- Tell us about your investment portfolio.
- Provide account information.
- Give us your contact details.

Why can't I limit all sharing?

Federal law gives you the right to limit only:

- Sharing for affiliates' everyday business purposes - information about your creditworthiness.
- Affiliates from using your information to market to you.
- Sharing for non-affiliates to market to you.

State laws and individual companies may give you additional rights to limit sharing.

SMS / Text Messaging Privacy Disclosure

SMS Communications and Consent. GVCN offers SMS, as an optional, nonpromotional, one-to-one channel for authorized representatives to communicate with consenting clients and prospective clients. Messages are limited to appointment scheduling, meeting confirmations, responses to general inquiries, and routine administrative follow-up. This SMS program does not send marketing campaigns, investment recommendations, securities solicitations, trade instructions, or transaction authorizations. SMS participation is not a condition of receiving advisory services.

Information Collected. In connection with SMS communications, GVCM may collect your mobile telephone number, name, consent status, date and method of opt-in, communication preferences, message content, and related message records. GVCM uses this information to send and respond to authorized messages, provide services, maintain records, and satisfy legal and regulatory obligations.

Mobile Information Sharing. No mobile opt-in information or text messaging consent information will be shared with third parties or affiliates for marketing or promotional purposes. GVCM does not sell mobile numbers or SMS opt-in data. GVCM may provide information to RingCentral, wireless carriers, and other service providers as necessary to deliver and support authorized messages, maintain business records, and comply with law. Such sharing is not for those parties' independent marketing or promotional use.

Opting Out and Assistance. You may opt out of receiving texts from an applicable GVCM messaging number at any time by replying **STOP**. You may receive one final message confirming your opt-out. For assistance, reply **HELP** or call GVCM at 262.650.1030. Opting out of SMS does not end your advisory relationship or prevent necessary communication through other channels.

Message Frequency and Charges. Message frequency varies based on your communications with GVCM and the messaging program for which you consented. Message and data rates may apply. Wireless carriers are not responsible for delayed or undelivered messages.

Information Security and Recordkeeping. Standard SMS may not be end-to-end encrypted. Do not send Social Security numbers, dates of birth, credentials, account numbers, account balances, trade instructions, or other nonpublic financial information by SMS. GVCM retains business-related messages when required by applicable law and its records-retention policies, and such communications are subject to supervisory review. Authorized representatives must use firm-approved messaging systems.

SMS Terms and Privacy Policy. This disclosure supplements GVCM's Privacy Policy. The applicable SMS opt-in form or consent mechanism should identify the messaging program and provide accessible links to the [Privacy Policy](#) and the [SMS Communications Terms of Use](#).

SMS Communications Contact Information.

Website: www.gvcmanagement.com | Telephone: 262-650-1030

The SMS notice supplements this Privacy Policy. Every SMS consent request must link to the current published versions of this Privacy Policy and the SMS Terms and Conditions.

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