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# PRIVACY POLICY

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## **Giving Tree Wealth Advisors Privacy Policy and Disclosures, 2023**

Thank you for allowing Giving Tree Wealth Advisors (GTWA) to service your account. Please read this document carefully, as it contains important information about our policies and procedures, the responsibilities of your financial consultant, as well as your rights and responsibilities as an investor. Once you read this document if you have any questions, please do not hesitate to contact your financial consultant.

### **YOUR PRIVACY**

You have provided your financial consultant and GTWA with confidential information so that we can help you meet your personal financial goals. Preserving this confidentiality and your privacy is of the highest importance to us. We hold all personal information provided to us in the strictest of confidence, including information that we collect from you in connection with any of the services we provide.

#### How We Protect Your Information

1. GTWA does not rent or sell your name or other personal information. We only share information with affiliated and non-affiliated third parties - such as our clearing firm - for the purpose of servicing your financial needs. This may include information required to process transactions on your behalf, conduct our operations, follow your instructions as you authorize, market our products and services, and to protect the security of our financial records. We may also disclose certain information as required or permitted under applicable law, for example, to government and regulatory bodies.
2. We restrict access to your personal information to personnel who need that information to service your account or to provide you with our products and services. We share a limited amount of information with our clearing firm in order to execute securities transactions on your behalf, or so that we can discuss your financial situation with your accountant, attorney, or other professionals as designated by you.
3. We enforce policies and procedures that preserve your privacy. GTWA maintains physical, electronic, and procedural safeguards to protect the security and confidentiality of your information.

The categories of nonpublic personal information that we collect from your account applications and other forms, in interviews, or by other means depend upon the scope of the relationship you have with your financial consultant. This may include information about your finances and personal profile (such as social security number, annual income and net worth, investment experience), information about your health to the extent that it is needed for the planning process (for insurance applications), and information about transactions between you and third parties (trading history and account balances).



## **ABOUT YOUR STATEMENTS & CONFIRMATIONS**

GTWA has an agreement with our custodial partners and product sponsors to custody certain accounts on our behalf. Your confirmations and statements are generated by these custodial partners and product sponsors and contain important information about your account. Please review these upon receipt. The confirmations have information about each of your trades, including whether the order was solicited or unsolicited.

What is a solicited order? Whenever you follow a transaction recommendation made by your financial consultant, the order is considered solicited. An order resulting from a research report or a written communication by your financial consultant is also considered solicited.

Orders not recommended by your financial consultant are marked as unsolicited. If an order is not marked, we will consider it to be a solicited trade.

Please remember that all checks for investments should include your account number and must only be made payable to the carrying firm of your account or other approved product sponsors. Checks should not be made payable to GTWA or any other person or entity. Any questions you may have concerning the conduct of your account should be addressed to your financial consultant.

## **OUTSIDE BUSINESS & APPROVED PRODUCTS**

Your financial consultant is an independent contractor and not an employee of GTWA. While your financial consultant's securities business is conducted through GTWA, as an independent professional he or she may engage in outside business activities that are not conducted through us nor under our supervision. In connection with these outside, non-securities businesses, please note that your financial consultant is not acting as an agent of GTWA, and that all non-securities goods and services that may be offered are not authorized or recommended products or services of GTWA.

## **RISKS**

Many risks are inherent when investing in securities. We would like to make you aware of a few of the more hazardous ones.

*Fast Market Risks.* A fast market is characterized by wide price fluctuations and heavy trading. It often comes as a result of an imbalance in trade orders (all sells and no buys for example), and can be brought on by such events as a dearth of market makers, a company news announcement, or strong analyst recommendation. Several risks are inherent in a fast market, including execution prices differing from quotes, and executions and quotes delayed and orders filled in segments.

*Margin Risks.* A decline in the value of securities or a change in maintenance requirements may cause you to provide additional funds to avoid the forced sale of securities in your account. The clearing firm reserves the right to change maintenance requirements at any time, therefore when trading on margin, you should keep in mind the impact that a potential change may have on your account. Additionally, margin interest will add to losses or significantly reduce earnings.

*Day Trading Risks.* Day trading is generally understood to be an overall trading strategy characterized by regular multiple intra-day orders to purchase and sell the same security or securities. Day trading is not generally appropriate for someone with limited resources and limited investment or trading experience, or low risk



tolerance. Several risks are inherent in day trading, and you could lose all of the funds that you use for day trading. You should not fund day trading activities with money that you cannot afford to lose, including retirement savings, student loans, second mortgages, emergency funds, funds set aside for purposes such as education or home ownership, or funds required from current income to meet your living expenses. Be cautious of claims of large profits.

GTWA may not have adequate systems capacity to permit day trading activities (please also see Fast Market Risks, above). Day trading usually includes aggressively trading your account, and commissions on each trade may add to your losses or significantly reduce your earnings. Day trading on margin or short selling may result in losses beyond your initial investment (please see Margin Risks, above). Short day trading also may lead to extraordinary losses, because you may be required to purchase securities at a disadvantageous price to cover a short position.

### **THE USA PATRIOT ACT**

In response to the attacks on the U.S. on September 11, 2001, Congress approved the USA PATRIOT Act. The PATRIOT Act is designed to detect, deter, and punish terrorists in the United States and abroad who use or attempt to use the U.S. financial system to aid in their activities. The Act imposes new requirements for brokerage firms and financial institutions, requiring stricter controls and more comprehensive programs to identify money laundering.

As part of these new requirements, GTWA Securities designated a special compliance officer for our anti-money laundering program, who sets up employee training, conducts independent audits, and established policies and procedures to detect and report suspicious transactions. As part of our program, you may be asked by your financial consultant, or by us, to provide various identification documents or other information. In addition, your financial consultant may inquire about and/or request supporting documentation concerning the source of funds deposited in your account. Until we receive this information, we may be unable to open or modify an existing account, or effect any transactions, including withdrawals of funds.

### **POTENTIAL CONFLICTS OF INTEREST**

Investment Advisor Representatives of GTWA may be affiliated with Fortune Financial Service, Inc., an independent broker/dealer. Financial Consultants have the ability to build investment portfolios based on the specific needs and goals of each individual client. Fortune Financial Services offers a wide variety of approved products and programs including stocks, bonds, options, mutual funds, annuities, life insurance, alternative investments, college savings plans. These products may be offered in addition to or as an alternative to fee based investment management through GTWA, but only when it has been documented and reviewed as in the best interest of helping the client meet their financial goals. It is important to know that the Product Sponsors pay extra compensation to the affiliated financial consultant which would be in addition to any fees paid through advisory services through GTWA



## **YOUR RIGHTS & RESPONSIBILITIES**

We believe that the needs of our investors should always come first. As an investor, you have certain rights and responsibilities. They are outlined as follows:

### **Your Rights:**

- 1) You should be treated in a fair, ethical and respectful manner in all interactions with GTWA and our employees and affiliates.
- 2) You have the right to competent and courteous service and advice (if provided) at a fair price.
- 3) You have the right to clear and accurate descriptions of your transactions.
- 4) You have the right to know commissions and fees associated with your accounts.
- 5) Your statement should provide timely and accurate account and transactional information and should reflect all positions held.
- 6) You should be provided with GTWA's policies and practices for protecting the privacy of nonpublic, personal information.
- 7) You should expect our assistance in helping you clarify your investment goals and risk tolerance.
- 8) You should expect our assistance in setting realistic expectations about the long-term performance and associated risk of different securities.
- 9) You should be provided with responsible investment recommendations based on your objectives, time horizon, risk tolerance, and other factors as disclosed by you.
- 10) You have the right to fair consideration and a prompt response from GTWA Securities should a problem with your account arise.
- 11) You should be apprised of alternatives should we be unable to resolve a dispute to your satisfaction.
- 12) Any affiliate of the firm must maintain an accurate and up to date public record which can be viewed online by visiting [Brokercheck.finra.org](https://www.brokercheck.finra.org)

### **Your Responsibilities:**

- 1) You should carefully read sales literature, prospectuses, and/or other offering documents, when available, before making purchases. You should carefully consider all investment risks and/or considerations contained in the documents.
- 2) You should understand that all investments have some degree of risk and that it is possible to lose money on any investment.
- 3) Review all transaction confirmations and account statements or reports carefully and promptly. Report any errors or any questions you have to your financial consultant immediately.



- 4) If seeking investment advice, you are responsible for providing accurate information about your financial status, goals, and risk tolerance to ensure that appropriate recommendations are provided.
- 5) You should promptly bring problems or questions concerning accounts to the attention of GTWA or your financial consultant.
- 6) You should promptly notify your financial consultant whenever there are significant changes in your investment objectives, risk tolerance, net worth, or liquidity needs.
- 7) You should make certain that you understand the correlation between risk and return.
- 8) You should consult an attorney or tax advisor for specific tax or legal advice.
- 9) You should review your portfolio holdings on a regular basis (at least quarterly) and whenever your financial circumstances change. You may want to make appropriate changes based on your investments' performance and your current objectives.
- 10) If you have any holdings in mutual funds, you should notify your financial consultant about similar mutual fund holdings you have at other broker-dealers or directly with the mutual funds, so that your financial consultant can ensure that you receive any applicable "breakpoint" discounts.
- 11) If you choose automated channels for your trading needs (e.g. internet or telephone) you are fully responsible for your investment choices.
- 12) You should carefully consider the validity and reliability of investment information obtained from all sources, especially unsolicited information obtained over the internet.