

Privacy Policy

Last Updated: December 2022

We are proud of our privacy and confidentiality practices, and we want you to know how we protect your data. This Privacy Policy (“Policy”) identifies the ways Commonwealth Financial Network® (“Commonwealth”) and its affiliates (“we,” “us,” or “our”) collect, store, use, disclose, and protect your personal information.

1. Introduction

Commonwealth distributes a variety of financial products and services to you through its network of independent registered representatives, investment adviser representatives, and insurance agents (“Representatives”). We have always valued the trust our customers place in us and are committed to the responsible management, use, and protection of our customers’ personal information (i.e., information that can be used to identify an individual).

This Policy identifies the ways Commonwealth collects, stores, uses, discloses, and protects the personal information you provide to us when you use our website, located at www.commonwealth.com (the “Website”), our online services, our mobile applications, our social media pages, and any other product or service that links to this Policy (collectively, our “Services”). If you have entered into a separate agreement with us, that separate agreement shall control, and only those terms within this Policy that do not conflict with such separate agreement shall apply. If you are a Commonwealth Representative, your separate agreement with us, not this Policy, shall apply to our relationship (unless you are a California resident; in that case, please refer to our [California Consumer Privacy Act Notice](#)). This Policy does not cover information we receive from third parties. Please note that depending on your relationship with us, other privacy policies may apply in addition to this Policy, such as when you apply for or use Commonwealth financial products or services. By accessing the Services, you agree to the practices regarding your personal information outlined in this Policy. Each time you use the Services, the current version of this Policy will apply. Accordingly, when you use the Services, you should check the date that appears at the top of this document and review any changes since you last looked at the Policy.

Please note: This Policy applies to the websites and online services of Commonwealth and not to those of Commonwealth Representatives. For details about their privacy practices, please contact your Representative.

2. Information We Collect About You

Information You Provide to Us

We collect personal information that you voluntarily provide to us when you use our Services (For example, you may provide us with your contact information such as your first name and last name, email address, phone number, and location; information about your current firm; your approximate assets under management; the content of your communication; or other personal information.) and when you choose to submit such information to us through email, an online form, or other methods (e.g., contacting us through our “Let’s Connect” Website feature).

We also collect certain personal information from individuals who are exploring a relationship with us or seeking to learn more about Commonwealth. For example, an individual may inquire about becoming an investor, advisor, or agent with Commonwealth. The types of personal information that we collect will depend upon the specific type of relationship you have or seek with us.

If you interact with us on social media, we may collect your social media profile information, your communications with us, and your communications and posts on our social media pages and forums. If you use any of our chat or communication features, we will collect the content of your communications through such features.

Commonwealth Online Services

We collect personal information when you use or enroll in Commonwealth’s online services, including our mobile applications, such as your name, address, email address, phone number, social security number, and Internet Protocol (IP) address and/or domain, as well as other data you may provide us in connection with your use of our online services, such as information related to a financial product or service, including, but not limited to, investment preferences, demographic information, citizenship information, date of birth, and financial information. This may include your financial account information, account summaries

and balances, account performance, and account activity, as well as statements, documents, and reports associated with your account. We may also receive your contact information from a third-party website regarding requests about financial products and services on that website. For Commonwealth 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 Services. If you use messaging functions through our mobile application, we collect the content of any message that you send through the mobile application. Communications among users that occur outside our mobile application and Services are not governed by this Policy.

Users of Commonwealth's online services may also provide us with information about their professional advisors, such as their accountant, tax advisor, or attorney; and information about family members and other third parties, such as spouses, children, and beneficiaries.

Plaid Aggregation Services

Commonwealth's online services may provide access to account linking and aggregation services through Plaid Inc. ("Plaid"). By using Plaid's services, you acknowledge and agree that the terms of Plaid's Privacy Policy (currently located at <https://plaid.com/legal/#end-user-privacy-policy>), not this Policy, will govern Plaid's use of such information and any information Plaid collects from or about you, and you expressly agree to the terms and conditions of Plaid's Privacy Policy. Further, you expressly grant Plaid the right, power, and authority to access and transmit your information as reasonably necessary for Plaid to provide its services to you. Please note that Plaid is an independent third party; Commonwealth has no control over Plaid's use of your information. If you do not agree to Plaid's use of your information, do not use Plaid's services.

Information We Automatically Collect

When you use our Services, we automatically receive and collect information from your device. This information includes the following:

- Information about your device, such as the operating system, hardware, system version, IP address, device ID, and device language
- The specific actions you take when you use our Services, including, but not limited to, the pages and screens you view or visit, search terms you enter, and how you interact with our Services
- The time, frequency, connection type, and duration of your use of our Services
- Information regarding your interaction with email messages; for example, whether you opened, clicked, or forwarded the email message
- Identifiers associated with cookies or other technologies that may uniquely identify your device or browser (as further described below)
- Pages you visited before or after navigating to our Services

Employment

If we have collected your personal information through our "Careers" page in response to a job opening, you are giving us permission to use and retain your information for the purpose of evaluating your application for employment for the specific position you applied to, as well as other roles at Commonwealth. This personal information may be processed and stored by a third-party talent tracking solution provider as well as with vendors, consultants, and other service providers who need access to such information to carry out work relating to the recruitment process on our behalf.

Aggregate Information Collected

Aggregate information is information that does not identify you. It may be collected when you use our Services, independent of any information you voluntarily enter. In addition, we may use one or more processes to de-identify information that contains personal information, such that only aggregate information remains. We may collect, use, store, and transfer aggregate information without restriction.

3. Use and Sharing of Your Personal Information

How We Use Your Information

In general, we collect information and personal information from you so we can provide our Services, operate our business, and provide the information you request from us. This includes, but is not limited to, the following:

- Provide information, products, or services you request
- Verify your identity when accessing our Services
- Compare information for accuracy and verify our records
- Detect and prevent fraud, security or technical issues, or criminal activities
- Evaluate you for an employment position with us (if you apply)
- Operate, improve, maintain, and protect our Services
- Provide technical and other support
- Send updates, marketing communications, and other information about Commonwealth, Representatives, and Services
- Send you notices and alerts
- Facilitate your subscription to our blog
- Conduct research and analytics, monitoring and analyzing trends and usage
- Contact you and respond to your inquiries
- Send you email newsletters
- Register you for an account in our online services
- Enhance or improve user experience, our business, and our Services, including the safety and security thereof
- Personalize our Services to you
- As necessary to comply with any applicable law, regulation, subpoena, legal process, or governmental request
- Enforce contracts, our Terms of Service, and User Agreement(s), including investigation of potential violations thereof
- Protect against harm to the rights, property, or safety of Commonwealth, our users, or the public as required or permitted by law

How We Share Your Information

We do not rent or sell your personal information.

We may share some of your personal information with third parties that perform services for us. We may also transfer your personal information to third parties under the following circumstances:

- To comply with a legal requirement, law, subpoena, judicial proceeding, court order, governmental request, or legal process
- To investigate a possible crime, such as fraud or identity theft
- In connection with the sale, purchase, merger, asset sale, financing, reorganization, liquidation, or dissolution of Commonwealth, including the evaluation thereof
- When we believe it is necessary to protect the rights, property, or safety of Commonwealth or other persons
- As otherwise required or permitted by law, including any contractual obligations of Commonwealth

Except as provided in this Policy, we share your personal information at your direction or when we have your consent to do so. If, for example, you connect our Services to third-party software or services, such as your accounting or tax software provider, we will share your information with such provider. If you use our online services, your financial advisor may have access to your online services account information.

4. Storage and Protection of Your Personal Information

To protect the privacy and security of personal information, we use reasonable administrative, technical, physical, and operational safeguards. Given the open nature of the internet, however, your personal information may be transmitted without security measures over networks connecting you to Commonwealth's systems and may be accessed and used by parties other than those for whom the data is intended. To safeguard against unauthorized access, Commonwealth employs secure network architectures, such as encryption techniques, firewall barriers, authentication protocols, and intrusion detection. Despite these safeguards and our additional efforts to secure your personal information, we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your personal information.

5. Cookies and Analytics

A cookie is a text file 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. Commonwealth 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 reject cookies; however, this may affect your experience with certain features of our Website, and some features and functions may not be available. Although we do our best to honor the privacy preferences of our visitors, we are not able to respond to Do Not Track signals from your browser.

Our Website uses certain analytics tools, such as Google Analytics, Pardot, and VWO, to provide insight into our Website and to improve the relevance of advertisements you receive. You may be able to opt out of these analytics tools by visiting the applicable website. If you would like to opt out of Google Analytics, for example, please visit <https://tools.google.com/dlpage/gaoptout>.

6. Third-Party Websites and Social Media

The Services may contain hyperlinks to websites operated by third parties, which may include social media features, such as Facebook, LinkedIn, YouTube, Instagram, and Twitter buttons or links. We provide such hyperlinks for your reference and convenience only. We do not control such websites and are not responsible for their content or the privacy or other practices of such websites. It is up to you to read and fully understand their privacy policies. Our inclusion of hyperlinks to such websites does not imply any endorsement of the material on such websites or any association with their operators. If you are submitting information to any such third party through our Services, you should review and understand that party's applicable policies, including their privacy policies, before providing your information to the third party.

7. California Residents

Under the California Consumer Privacy Act ("CCPA"), California residents have certain rights regarding their personal information. Please see our [California Consumer Privacy Act Notice](#) for further information.

8. Children's Privacy

Our Services are not intended for use by children younger than 13, and we do not knowingly collect personal information from children younger than 13.

9. Updating and Correcting Your Personal Information; Opt Out

If your personal information or account information is incomplete, inaccurate, or outdated, please contact your financial advisor (if applicable) or Commonwealth at 800.251.0080.

If you no longer wish to receive our marketing and promotional communications, you may opt out by following the instructions included in each communication.

10. Questions About Your Privacy

Please email cfnpriacyoffice@commonwealth.com if you have questions or concerns regarding our use of your personal information or this Policy.

11. Updates to This Online Privacy Policy

This Policy is subject to change without notice and should be reviewed each time you use our Services. You should also check the date of this Policy to see whether changes have been made since the previous version. Changes to this Policy take effect when the revised Policy is posted. You accept the revised Policy when you use the Services following any changes.



Facts		What Does Commonwealth Financial Network® 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 can include: <ul style="list-style-type: none"> • Name, email address, internet protocol (IP) address, address, social security number, date of birth, citizenship, signature • Financial account number, financial account balances, trading history, payment history • Net worth, assets, income, investment experience, employment information • Transactions or credit relationships with nonaffiliated third parties • Medical information (if applying for insurance) 	
How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons why financial companies can share their customers’ personal information, the reasons why Commonwealth may choose to share personal information, and whether you can limit this sharing.	

Reasons Why We Can Share Your Personal Information	Does Commonwealth Share?	Can You Limit This Sharing?
For our everyday business purposes —to process transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes —to offer new products or services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates’ everyday business purposes —we may share your personal information with our affiliates to process transactions, maintain your account(s), or respond to court orders and legal investigations.	Yes	No
For our affiliates’ everyday business purposes —information about your creditworthiness	No	We don’t share
For nonaffiliates’ everyday business purposes —to assist us in obtaining business or providing account maintenance or customer service to your account(s)	Yes	No
For our affiliates to market to you —to offer new products or services to you	No	We don’t share
For nonaffiliates to market to you —Commonwealth does not sell, share, or disclose your nonpublic personal information to nonaffiliated third-party companies.	No	We don’t share
For advisors who leave Commonwealth —if you have a Commonwealth advisor servicing your account(s) who leaves Commonwealth to join another financial institution, the advisor may retain copies of your personal information so that they can continue to serve you at the new firm. In doing so, your advisor may share your information with the new firm but is otherwise required to keep confidential the personal information obtained from you while the advisor was affiliated with Commonwealth, and they may use it only to service your account(s). Please note: Certain states require affirmative consent to allow sharing. See below for more on your rights under state law.	Yes	Yes
In the event that a Commonwealth advisor terminates their relationship with Commonwealth and you want to follow your advisor to their new firm, please do not request to limit our sharing.		

To Limit Our Sharing

- Call Commonwealth’s Client Privacy Line at **844.668.9880**.
- Mail your request to **Commonwealth Financial Network, Attn: Privacy, 29 Sawyer Road, Waltham, MA 02453-3483**.

Please note: If you are a *new* customer, we can begin sharing your information from the date we provided you with this notice. When you are *no longer* our customer, we continue to share your information as described in this notice; however, you can contact us at any time to limit our sharing.

Questions?

Call **844.668.9880** or go to **www.commonwealth.com**.

Who We Are

Who is providing this notice?

Commonwealth Equity Services, LLC, doing business as Commonwealth Financial Network® (“Commonwealth”), a dually Registered Investment Adviser and broker/dealer, and its affiliates CES Insurance, LLC, and Advisor360® LLC (collectively, “Commonwealth”), is providing this notice. Commonwealth distributes a variety of financial products and services to you through our network of financial professionals who are independent Registered Representatives, Investment Adviser Representatives, and insurance agents (collectively, “advisors”). Securities are not offered or provided by Commonwealth on behalf of the federal government, and the offer of such securities is not sanctioned, recommended, or encouraged by the federal government.

What We Do

How does Commonwealth protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. We protect your personal information in the following ways:

- We only grant access to your personal information to parties with whom we have executed confidentiality/nondisclosure agreements and who need that information to serve you or to assist us in conducting our operations.
- We have physical and electronic safeguards in place to ensure that we comply with our own policy, industry practices, and federal and state regulations.
- Our employees are trained in the proper handling of nonpublic personal information.

How does Commonwealth collect my personal information?

Commonwealth collects nonpublic personal information from you, as well as from other sources. The sources and the information collected may include:

- Information you provide to us, to our affiliated entities, or to your advisor on applications and related forms, through discussions with our customer service staff, use of our online services, or on our website
- Information regarding your transaction history with us
- Information from other nonaffiliated third parties, including employers, associations, benefit plan sponsors, credit bureaus, and other institutions, if you transfer positions or funds to Commonwealth

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 nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. (See below for more on your rights under state law.)

What happens when I limit sharing for an account I hold jointly with someone else?

If you have a joint account, we will treat an opt-out direction by a joint customer as applying to all associated joint customers. Any account holder may express a privacy preference on behalf of the other joint account holders.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- CES Insurance, LLC
- Advisor360®, LLC

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- This may include insurance companies, broker/dealers, investment advisers, mutual fund companies, banks, investment firms, third-party administrators, clearing firms, retirement plan sponsors, and other third parties.

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- This may include banks, credit unions, or other financial institutions with which we have a joint marketing agreement.

Other Important Information

If you live in an “opt-in” state, we are required to obtain your affirmative consent to share your nonpublic personal information with nonaffiliated third parties who do not currently assist us in servicing your account or conducting our business.

California and North Dakota residents: For accounts with a California or North Dakota mailing address, we will not share your personal information with a financial company for joint marketing purposes, except as required or permitted by law.

Nevada residents: This notice is being provided pursuant to state law. If you prefer not to receive marketing calls, contact your advisor directly.

Vermont residents: For accounts with a Vermont mailing address, we will not share your creditworthiness information with our affiliates, except as required or permitted by law. For joint marketing with other financial companies, we will disclose only your name, contact information, and information about your transactions, unless otherwise required or permitted by law.