



CONNECTICUT
WEALTH MANAGEMENT, LLC

Privacy Policy

Effective: April 1, 2020

Connecticut Wealth Management, LLC
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Our Commitment

The team at Connecticut Wealth Management, LLC (“CTWM”) greatly appreciates the trust our clients place in us. Through our financial planning and investment advisory processes, we gather personal information about our clients, which we are committed to safeguarding.

CTWM protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes. Our relationship with our clients is our most important asset. We understand that our clients have entrusted us with their private information, and we do everything that we can to maintain that trust.

CTWM does not sell client information to anyone. Nor do we provide such information to others except for proper business purposes in connection with the servicing and management of our relationship with our clients, as discussed below.

Details of our approach to privacy and how our clients’ personal information is collected and used are set forth in this Privacy Policy.

Why you need to know?

CTWM is a Registered Investment Advisor (“RIA”), owing a fiduciary duty to our clients. As part of the normal course of business, we share some personal information. Federal and State laws give our clients the right to limit some of this sharing. Federal and State laws require RIAs to disclose how they collect, share, and protect personal information.

What information do we collect from our clients?

- Social security or taxpayer identification number(s)
- Name(s), address(s) and phone number(s)
- E-mail address(s)
- Account information
- Assets and liabilities
- Income and expenses
- Investment activity
- Investment experience and goals

What information do we collect from other sources?

- Custody, brokerage and advisory agreement(s)
- Other advisory agreement(s) and legal document(s)
- Transactional information with us or others
- Account application(s) and form(s)
- Investment questionnaire(s) and suitability document(s)
- Other information needed to service account(s)

How do we protect our clients’ information?

To safeguard personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as multiple complex passwords, secured files and a secure building. Our employees are advised about CTWM’s need to respect the confidentiality of each client’s personal information. We train our employees on their responsibilities and communicate the importance of confidentiality.

We require third parties that assist in providing our services to our clients to protect the personal information they receive. This includes contractual language in our third-party agreements.

How we share your information?

From time to time we may need to share personal information regarding our clients to effectively provide services. In the section below, we list some reasons we may share personal information.

Basis For Sharing	Sharing	Limitations
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; regulatory requirements to supervise certain Advisor activities; responding to regulators or legal investigations; and credit reporting.	CTWM may share this information.	Clients cannot limit the Advisor's ability to share.
Administrators We may disclose non-public personal information to companies we hire to help administer our business. Companies that we hire to provide services of this nature are not allowed to use client information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of client information to the performance of the specific service we have requested.	CTWM may share this information.	Clients cannot limit the Advisor's ability to share.
Marketing Purposes CTWM does not disclose personal information with non-affiliated third parties. Certain laws may give CTWM the right to share personal information with financial institutions where clients are a customer and where CTWM or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing client accounts, not for marketing purposes.	CTWM does not share personal information.	N/A
Authorized Users Personal information may be disclosed to interested parties such as attorneys or accountants only after permission from the client has been provided to CTWM.	CTWM does share personal information.	Clients authorize CTWM with whom to share.
Information About Former Clients CTWM does not disclose personal information to non-affiliated third parties with respect to persons who are no longer our clients.	CTWM does not share personal information regarding former clients	N/A

State-specific Regulations

Massachusetts	In response to a Massachusetts law, clients must "opt-in" to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of our account(s).
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Changes to our Privacy Policy

In an effort to keep our clients up-to-date on our policy, we will send a Privacy Policy notice annually for as long clients maintain an ongoing relationship with us. Periodically we may revise our Privacy Policy, and will provide clients a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify our clients and provide them with an opportunity to prevent the information sharing. We appreciate our clients' trust in us.

Any Questions?

Please contact Michael Tedone, Chief Operating Officer, at (860) 470-0290 with any questions.