

PRIVACY POLICY

WEALTH HABITS
STRATEGIC INVESTORS

Derastone LLC

Understanding Our Privacy Policy

1

As a licensed financial advisor and fiduciary, we are legally required to maintain the privacy and confidentiality of your nonpublic information pursuant to SEC regulations.

2

As CFP® Professionals (only ~25% of financial advisors are also CFP® Professionals), we have an additional layer of Ethical, Confidentiality, and Privacy standards to adhere to.

3

If you are not an active client of our firm but have shared sensitive information with us, it is securely stored in our Document Management System (DMS). Your general contact information (i.e., non-sensitive information) is safely and securely stored in our Contact Management System (CRM).

4

If you are an active client of our firm, we are authorized to share your information with third parties to the extent necessary to deliver the services you have hired us to perform. For example, if you are an active client of our firm, we would need to provide certain information to the Broker to open/transfer accounts and manage your investments.

5

We DO NOT sell your information to anyone and DO NOT share your information with any third-party for any other purpose except to render the services you've hired us to provide.

What do we do with your personal information?

Why?

As a licensed financial advisor and fiduciary, we are legally required to maintain the privacy and confidentiality of your nonpublic information pursuant to SEC regulations.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number
- Financial account balances, holdings, and transaction history
- Investment experience, income, and assets

When you are no longer our customer, we continue to share your information as described in this notice.

How?

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

What personal information can we share?

Reasons we can share your personal information	Do we share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes in order to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	N/A
For our affiliates' everyday business purposes such as information about your transactions and experiences	No	N/A
For nonaffiliates to market to you (e.g. external tax accountants)	Yes	No

Who are we and what do we do?

Who is providing you with this notice?

Wealth Habits
wealthhabits.com

Strategic Investors
strategicinvestors.com

How does Wealth Habits & Strategic Investors protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings, as well as other physical, electronic and procedural safeguards.

How does Wealth Habits & Strategic Investors collect my personal information?

We collect your personal information, for example, when you

- Sign an investment advisory agreement
- Open an account
- Request investment or financial planning advice
- Tell us about your investment or retirement portfolio

Why can't I limit all sharing?

Federal law gives you the right to limit only

- Sharing for affiliates' everyday business purposes such as 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.

Definitions

Affiliates

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

Non-affiliates

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

Joint marketing

A formal agreement between non-affiliated financial companies that together market financial products or services to you.