



## KILTER GROUP LLC PRIVACY POLICY

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. All financial companies need to share clients' personal information to run their everyday business. Kilter Group LLC ("Kilter Group") is providing this notice. In the section below, Kilter Group will list the reasons financial companies can share their clients' personal information; the reasons Kilter Group chooses to share and whether you can limit this sharing. Please read this notice carefully to understand our policy. The following document outlines what Kilter Group does with your personal information. The types of personal information we collect, and share depends on the product or service you have with us.

This information can include, but is not limited to:

- Social Security number and income;
- Assets and transaction history; and
- Investment experience and risk tolerance.

If you are a new client, we can begin sharing your information from the date we sent this notice. When you are no longer our client, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing by calling our main office at 646-438-6557.

Reasons we can share your personal information	Do We Share?	Can You Limit Sharing?
<b>For our everyday business purposes:</b> Such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	NO
<b>For our marketing purposes:</b> To offer our products and services to you	YES	YES
<b>For joint marketing with other financial companies</b>	NO	We do not share
<b>For our affiliates everyday business purposes:</b> Information about your transactions and experiences	NO	We do not share
<b>For our affiliates everyday business purposes:</b> Information about your creditworthiness	NO	We do not share
<b>For our affiliates to market to you</b>	NO	We do not share
<b>For non-affiliates to market to you</b>	NO	We do not share

- Kilter Group has the following Affiliated Entities related by common ownership or control: Kilter Insurance Brokerage LLC, Kilter Consulting LLC
- Non-Affiliated Entities are entities not related by common ownership or control. They can be financial and non-financial companies. Kilter Group has data sharing arrangements with the following entities: **None**
- Kilter Group has the following Joint Marketing Relationships where a formal agreement is in place with nonaffiliated financial companies that together market financial products or services to you: **None**

### Frequently Asked Questions:

#### **How does Kilter Group protect my information?**

To protect your personal information from unauthorized access and use, we restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We also maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

#### **How does Kilter Group collect my personal information?**

We collect your personal information, for example, when you: open an account or give us contact information; enter into an investment adviser contract or give us your income information; tell us about your investment or retirement portfolio. We also collect your personal information from other companies.

#### **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.

#### **Other Important Information:**

By signing Kilter Group's Agreement, I acknowledge that I have fully read and understand this Privacy Policy and opt-in as outlined above. I understand that if I have any questions or concerns about this policy, it is my responsibility to discuss this with my financial professional.

## SMS TEXTING POLICY

Kilter Group is committed to protecting your privacy. This SMS Privacy Policy explains how we collect, use, disclose, and safeguard your information when you opt in to receive SMS messages from us.

### **Information We Collect:**

When you opt into our SMS program, we may collect the following information:

- Your phone number
- Any other information you provide to us through SMS.

### **How We Use Your Information:**

We use the information we collect to:

- Send you SMS messages related to our services, events, and updates.
- Respond to your inquiries and provide customer support.

### **Data Sharing:**

We do not sell or rent your personal information to third parties. However, we may share your information with trusted service providers, such as SMS delivery platforms.

### **Opt-Out of SMS Communication:**

You can opt out of receiving SMS messages at any time by texting "STOP" to the firm representative number. After opting out, you will no longer receive SMS messages.

### **Data Security:**

We use industry-standard security measures to protect your personal information. We implement appropriate technical and organizational measures to protect your information from unauthorized access, use, or disclosure.

### **Your Rights:**

You have the right to access, update, or delete your personal information by contacting us directly. If you wish to exercise these rights, please email us at [info@kiltergroup.com](mailto:info@kiltergroup.com)

- To initiate SMS messages with our firm, send SMS messages directly to the firm representative number.
- Opt out of receiving SMS messages from us at any time by replying "STOP" to any message you receive.

### **Changes to This Policy:**

We may update this SMS Privacy Policy from time to time. We will notify you of any changes by posting the new policy on our website and updating the effective date.

### **Contact Us:**

If you have any questions or concerns about this SMS Privacy Policy, please contact us at: 646-438-6557.