

## **PRIVACY POLICY NOTICE**

Last Updated: 07/28/2026

Stonebridge Financial Group, LLC (“**Stonebridge**,” “**we**,” or “**us**”) operates the website <https://stonebridgefg.com/> (the “**Website**”). We have adopted this privacy policy (the “**Policy**”) with recognition that protecting the privacy and security of the Personal Information we obtain about our customers is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain Personal Information about you. We want you to know what information we collect and how we use and safeguard that information.

**By accessing the Website, you agree to be bound by this Policy and our Website Terms of Use, which are linked in the footer of this Website and amended from time to time, and are incorporated by reference. If you do not agree to the terms of this Policy, please do not access the Website or any of its pages.**

This Policy applies to information we collect:

- Through the Website Including:
  - In communications, email, text, chat, and other electronic messages, between you and the Website;
  - When you interact with our advertising and content on third-party websites and services, if that advertising or content links to this Policy.
- Offline or through other means, including over the phone, through the mail, or in person.
- From your business representatives, such as your accountants, attorneys, and brokers.
- From third parties where you have authorized them to disclose this information to us. If you have questions about how a third party collects, uses, or discloses your personal information, you should contact them directly.

## **WHAT INFORMATION WE COLLECT**

We collect Personal Information as necessary to provide the Website and our other services. “Personal Information” is any information that is linked or reasonably linkable to an identified or identifiable individual.

The personal information we collect includes:

- Full name
- Date of birth
- Social Security number
- Driver’s license or other government-issued identification number
- Home and mailing address
- Email address
- Phone number

This Personal Information may be considered nonpublic personal information (“**NPI**”) under federal law. We will provide you with notice of our privacy practices regarding your NPI and opt-out rights at our initial transaction and will provide this notice annually if you maintain an ongoing relationship with Stonebridge, as required by federal law. To learn more about how we may share your NPI and your ability to opt out of the disclosure of this information, please review the section titled “WHAT INFORMATION WE DISCLOSE.”

We may also collect other categories of information, including:

- Information that is about you but (individually) does not identify you.
- Payment information, when you make a purchase or payment through our Website.
- Financial Information, such as financial account numbers and brokerage accounts.
- Account information, such as your username and password, if you create an account with one of our service providers, such as Charles Schwab, Black Diamond, and/or eMoney. We do not retain or store the information you provide to these third-party service providers, and we encourage you to review their privacy policies and terms of use to learn about their collection practices.
- Demographic information, such as your age, gender, and/or income level.
- Usage information, such as data about your internet connection, the equipment you use to access our Website, and usage details (such as the pages of the Website you visit, the time of your visit, and the time spent on those pages).
- Location Information, such as your location when you access and use our Website.

## HOW WE COLLECT THIS INFORMATION

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the Website.

We may collect this information when you provide it on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your device, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, logs, and other communication data, and the resources that you access and use on the Website.

- Information about your device and internet connection, including your IP address, operating system, device identifiers, location data, and browser type.

The information we collect automatically may include Personal Information, or we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file stored on your device. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Web beacons.** Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages and for other related statistics (for example, recording the popularity of certain content on the Website and verifying system and server integrity.)
- **Google Analytics.** We use Google Analytics to optimize our Website and services based on the traffic we receive and assist with marketing. To learn more about Google Analytics, including options for opting out and/or managing the ads you may see online, please visit: <https://policies.google.com/technologies/partner-sites>.
- **LinkedIn Insights.** We use LinkedIn Insights to understand which portion of our audience interacts with our Website from the social media platform. This tool may collect demographic information and behavioral information in the aggregate. To learn more about how you may opt out of this feature, please visit: <https://www.linkedin.com/mypreferences/g/guest-retargeting-opt-out>.
- **WealthReach.** We use WealthReach to enhance our Website and services, provide you with a more personalized experience, and analyze Website traffic to assist our marketing efforts. This tool may collect categories of information such as your contact information, demographic information, and

location data. To learn more about how you may opt out of this feature, please visit:  
<https://www.wealthreach.ai/do-not-sell-or-share>.

## HOW WE RETAIN YOUR INFORMATION

We retain your Personal Information for as long as it is necessary to provide you with the services you expect and require from us and to successfully run our organization and its operations. We may be required to maintain your Personal Information as long as it is necessary to:

- Comply with legal compliance needs;
- Exercise, establish, or defend legal claims; and/or
- Protect against fraudulent or abusive activity affecting our services or operations.

## HOW WE USE YOUR INFORMATION

We use the Personal Information that we collect about you or that you provide to us to:

- Provide you with our Website and any contents, features, information, products, or services that we make available through the Website.
- Provide you with the products and services available to you through the retirement and benefit plans in which you participate.
- Fulfill and manage your payments, transactions, and other requests.
- Provide you with notices about your account, including expiration and renewal notices.
- Improve our Website, including by analyzing the information we collect and creating aggregated data (which may be derived from Personal Information) to develop, maintain, analyze, improve, optimize, measure, and report on our Website and its features and how users interact with them.
- Promote our service, business, and offerings to you.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you when Website updates are available and about changes to any products or services we offer or provide through it.

We may also use your Personal Information in any other lawful way we may describe when you provide it, or for any other lawful purpose with your consent.

## WHAT INFORMATION WE DISCLOSE

We do not sell, share, or disclose your Personal Information, including NPI, to non-affiliated third-party financial companies. We will not disclose Personal Information or NPI we collect about our customers to any third party, except as necessary as follows:

- To persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.);
- To our attorneys, accountants, and auditors, only when necessary and as required;
- To contractors, service providers, and other third parties we use to support our organization and operations and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them. Disclosures to third parties such as broker-dealers, custodians, and independent managers are necessary to further our business relationship, effect the transactions requested by you, and provide the services they authorize;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Stonebridge Financial Group, LLC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Stonebridge Financial is among the assets transferred; or
- To fulfill the purpose for which you provide it.

We may also disclose your Personal Information for any other purpose disclosed by us when you provide it, when we have obtained your consent, or as otherwise provided by law.

We are permitted by law to disclose Personal Information and NPI about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). To opt out of the disclosure of your NPI to third parties for marketing purposes, please email: [info@stonebridgefg.com](mailto:info@stonebridgefg.com).

These third parties are prohibited from using or sharing Personal Information for any other purpose. If you decide at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

#### CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR PERSONAL INFORMATION

As described above, we may use your Personal Information to provide you with marketing communications we believe may be of interest to you. We have created mechanisms to provide you with the following control over your Personal Information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Website may then be inaccessible or not function properly. You can also opt out of third-party tracking tools by following the opt-out instructions from our third-party service providers. To learn more about these opt-out mechanisms, please see "HOW WE COLLECT THIS INFORMATION."

We do not control third parties' collection or use of your Personal Information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your Personal Information collected or used in this way. To learn more about opting out of receiving targeted advertisements from members of The Network Advertising Initiative ("NAI"), visit the NAI's website at NAI: How to Opt Out.

If you do not wish to receive promotional or marketing emails or newsletters from us, you can opt out by clicking the Unsubscribe link on the marketing email you received at any time or by sending us an email at [info@stonebridgefg.com](mailto:info@stonebridgefg.com). Please note that we will continue to send you transactional and informational emails about your account.

#### "DO NOT TRACK" AND USER PREFERENCE SIGNALS

We do not respond to web browser "Do Not Track" or other universal opt-out signals at this time. We will respond to such signals in the future, if and when we are required to do so, and will update this Policy accordingly at that time.

#### SECURITY OF YOUR INFORMATION

We restrict access to your Personal Information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your Personal Information.

#### CHANGES TO OUR PRIVACY POLICY OR RELATIONSHIP WITH YOU

Our Policy about obtaining and disclosing Personal Information may change from time to time. We will provide you notice of any material change to this Policy before we implement the change.

#### CHILDREN UNDER THE AGE OF 18

Our Website is not intended for children under 18 years of age. No one under age 18 may provide any information to or on the Website without parental consent. We do not knowingly collect Personal Information from children under 18. If you are under 18, do not use or provide any information on this Website or provide any Personal Information about yourself to us, including but not limited to your name, address, telephone number, email address, or any username you may use without parental consent. If we learn we have collected or received Personal Information from a child under 18, we will delete that information. If you believe we might have any Personal Information from or about a child under 18, please contact us at [info@stonebridgefg.com](mailto:info@stonebridgefg.com).

#### LINKS TO OTHER WEBSITES

The Website may contain links to other websites. The privacy and security policies of Stonebridge Financial apply only to our Website. Before accessing other external websites, please review their privacy and security policies.

#### SMS COMMUNICATIONS

Text message opt-in data and consent are not shared with any third parties (including subsidiaries and affiliates) except for service providers. We do not share phone numbers with third parties or affiliated entities for marketing or promotional purposes. If you wish to be removed from receiving future communications, text STOP to opt out. Text HELP for assistance.

To learn more about our SMS program, please review our SMS Terms & Conditions available in the footer of this webpage.

#### CONTACT US

If you have any questions about this policy, please contact us:

- By email at: [info@stonebridgefg.com](mailto:info@stonebridgefg.com)
- By writing to us at: Stonebridge Financial Group, ATTN: Legal Department, 602 North Front Street, Wormleysburg, PA 17043