

PRIVACY POLICY

I. WHAT DOES HOYLECOHEN DO WITH YOUR PERSONAL INFORMATION?

To maximize technology and process capabilities that support enterprise-wide profitability and scale.

Reasons we can share your personal information	Does HoyleCohen 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 to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We Don't Share
For our affiliates' everyday business purposes information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes information about your creditworthiness	No	We Don't Share
For nonaffiliates to market to you	No	We Don't Share

II. WHY?

Financial services organizations 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.



III. 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 and income
- Account balances and transaction history
- Investment experience and account transactions

When you are no longer our client, we will continue to share your information when required as described in this notice.

IV. HOW?

All financial services organizations need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer's personal information; the reasons HoyleCohen chooses to share; and whether you can limit this sharing.

V. QUESTIONS?

Call our office at (858) 576-7300 or email our compliance team at compliance@hoylecohen.com.



Who we are	
Who is providing this notice?	HoyleCohen LLC
Who we are	
How does HoyleCohen LLC protect my personal information?	To protect your personal information from unauthorized use, we use security measures that comply with federal law. These measures include computer safeguards, specifically computer firewalls to protect against threats or hazards to the security and/or integrity of customer records, as well as secured files and buildings.
How does HoyleCohen LLC collect my personal information?	<p>We collect your personal information, for example when:</p> <ul style="list-style-type: none"> You enter into an investment advisory agreement with us We open an investment account for you We move money for you from one account to another Through our discussions with you <p>We also collect your information from other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> Sharing for affiliates' everyday business purposes – information about your creditworthiness Affiliates using your information to market to you Sharing for non-affiliates to market to you <p>State laws may give you additional rights to limit sharing.</p>



Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and non-financial organizations.</p> <ul style="list-style-type: none">• Our affiliates include Focus Operating LLC
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial organizations.</p> <ul style="list-style-type: none">• HoyleCohen LLC does not share with nonaffiliates so they can market to you
Joint marketing	<p>A formal agreement between nonaffiliated financial organizations that together market financial products or services to you.</p> <ul style="list-style-type: none">• HoyleCohen LLC does not jointly market

