Effective October 26, 2026

Protecting your information is central to the trust you place in us. This policy explains what personal information Equity Comp Advisors ("we," "us") collects, how we use and share it, and the choices you have. It applies to:

- **Clients**, whose nonpublic personal information we protect under federal privacy rules for financial firms (Regulation S-P and the Gramm-Leach-Bliley Act).
- **Website visitors** to equitycompadvisors.com.
- **Subscribers and contacts** who sign up for our emails, register for events, or schedule time with us.

We do not sell your personal information, and we do not share it with third parties for their own marketing.

INFORMATION WE COLLECT

From clients, we may collect your name, address, email, phone number, date of birth, Social Security number, employment and occupation, income, assets, account and transaction history, insurance information, banking details, and other financial and tax information you choose to share.

From website visitors and contacts, we may collect:

- Contact details you submit through forms, email sign-ups, event registrations, or meeting requests (such as name, email, phone, company, and your message).
- Device and usage information collected automatically, such as IP address, browser type, device type, approximate location, pages visited, time on page, and the site that referred you.
- Campaign information, such as UTM parameters that tell us which email, social post, or ad brought you to our site.
- Email engagement data, such as whether you opened an email or clicked a link.
- Messages you send us through our social media accounts, along with your username and the name on your profile.

We do not knowingly collect sensitive financial information through our public website forms. Please don't submit account numbers or Social Security numbers through those forms.

HOW WE COLLECT INFORMATION

- **Directly from you**, through account opening forms, questionnaires, applications, and conversations by phone, email, or in person.
- **Through our website**, when you complete a form, subscribe to emails, or register for an event. Our forms are processed by Cognito Forms.
- **When you schedule a meeting**, through Calendly, which collects the details you enter and may sync with our calendars.
- **Automatically**, through cookies and similar technologies, including Google Analytics (see Cookies and Analytics below).
- **From your transactions** with us, our affiliates, custodians, and the product sponsors whose products you own.
- **From third parties**, such as consumer reporting agencies, as permitted by law.

HOW WE USE INFORMATION

We use personal information to:

- Provide, manage, and service your accounts and carry out your instructions.
- Respond to inquiries, including messages sent through social media, and schedule meetings.
- Send emails you have signed up for, such as newsletters, market commentary, and event invitations.
- Understand how our website and emails are used so we can improve them.
- Plan and manage events you register for.
- Meet our legal, regulatory, compliance, and recordkeeping obligations.

- Protect against fraud, unauthorized access, and security incidents.

HOW WE SHARE INFORMATION

We share personal information only as needed to run our business and serve you, and as required by law. This includes:

- **Custodians and product sponsors**, such as mutual fund and insurance companies, to execute and service your transactions.
- **Clearing firms and broker-dealers** that clear and settle your securities transactions, and banks or financial institutions where our representatives maintain an office.
- **Broker-dealers and insurance agencies** we have partnerships or affiliations with, to carry out transactions you request and service your accounts and policies. They do not use your information to market to you. When these firms are not our affiliates, we share information only under written agreements that limit how they can use it.
- **Third-party asset managers** that help manage client accounts.
- **Service providers** that support our operations, such as performance reporting, recordkeeping, client mailings, website hosting, form processing (Cognito Forms), email delivery (Flodesk), scheduling (Calendly), and analytics (Google).
- **Regulators and authorities**, including state and federal regulators and self-regulatory organizations, as required by law or legal process.
- **Professional advisors**, such as auditors and attorneys, and organizations we are licensed or registered with.
- **A successor firm**, in the event of a merger, acquisition, or sale of all or part of our business.

Our service providers are contractually required to use your information only to perform services for us, or are otherwise prohibited by law from further sharing it. Except as described here, we do not share information about current or former clients with affiliated or unaffiliated third parties, for marketing or any other purpose.

EMAIL COMMUNICATIONS

We send marketing emails only to people who have asked to receive them, for example by subscribing on our website, registering for an event, or opting in through a form. We use Flodesk to send these emails and measure basic engagement, such as opens and clicks.

You can unsubscribe at any time using the link at the bottom of any marketing email, or by contacting us at (512) 617-1984. We will process your request promptly, and within 10 business days.

If you are a client, unsubscribing from marketing emails does not stop service messages about your accounts, such as statements, confirmations, required disclosures, and regulatory notices.

TEXT MESSAGES

You may choose to receive text messages from us by checking the text message consent box on one of our forms or by otherwise giving us your consent. Messages may relate to your inquiry, your account, appointments, events, and our services. Message frequency varies, and message and data rates may apply. Consent to receive text messages is not a condition of any purchase or service.

Reply STOP at any time to stop receiving text messages, or HELP for assistance.

We do not share mobile phone numbers or text message consent with third parties or affiliates for their marketing or promotional purposes. This does not include service providers that help us deliver messages, such as our messaging platform.

COOKIES AND ANALYTICS

Our website uses cookies and similar technologies to keep the site working and to understand how visitors use it. We use:

- **Essential cookies**, which the site needs to function (for example, to submit forms).

- **Google Analytics**, which collects information about pages visited, time on site, device type, approximate location, and how you arrived at the site. Google processes this information on our behalf. You can learn more at policies.google.com/technologies/partner-sites and opt out with the Google Analytics opt-out browser add-on at tools.google.com/dlpage/gaoptout.
- **Campaign tracking (UTM parameters)** in links we share, so we can see which emails and posts bring people to our site.

We do not use advertising cookies or tracking pixels to target ads to you. You can block or delete cookies in your browser settings. Some parts of the site may not work as intended if you do.

Do Not Track. Some browsers send a "Do Not Track" signal. There is no common standard for responding to these signals, and our website does not currently respond to them.

YOUR CHOICES AND RIGHTS

Clients. Federal law gives you the right to limit some, but not all, sharing of your information. Because we share client information only in the ways described above, and not for marketing by affiliates or third parties, there is no additional sharing for you to opt out of, except as described under Departing Advisors below.

Website visitors and subscribers. You may ask us to:

- Tell you what personal information we hold about you.
- Correct information that is inaccurate.
- Delete information we hold about you, subject to legal and regulatory recordkeeping requirements.
- Stop sending you marketing emails.

Some state privacy laws give residents additional rights. We will honor requests as required by the laws that apply to us. To make a request, contact us at (512) 617-1984. We may need to verify your identity before acting on it, and we will not treat you differently for making a request.

California residents. Under California law, you may request information about whether we share personal information with third parties for their direct marketing purposes. We do not.

DEPARTING ADVISORS

We know many clients work with us because of their relationship with their investment adviser representative. If your advisor leaves our firm to join another registered investment adviser, we may allow them to take your name, address, phone number, email address, and the titles of the accounts they service, so they can continue serving you, as permitted by law.

If you do not want your information shared this way, contact us at (512) 617-1984 to opt out. You can opt out at any time, and your choice remains in effect until you tell us otherwise.

If you live in a state that requires your written consent before this information can be shared, including Alaska, California, North Dakota, and Vermont, we will not allow your advisor to take it without that consent.

For accounts held jointly, a privacy choice made by any account holder applies to all holders of that account.

HOW WE PROTECT YOUR INFORMATION

We maintain written policies and administrative, technical, and physical safeguards designed to protect personal information from unauthorized access or use. Access is limited to employees and service providers who need it to service accounts or perform compliance, legal, and audit functions. Our systems use password protection, multi-factor authentication, and other safeguards in line with state and federal requirements.

We also maintain an incident response program. If sensitive client information is accessed or used without authorization in a way that could cause harm, we will notify affected individuals as required by law, generally within 30 days of determining that the incident occurred.

STATE-SPECIFIC INFORMATION FOR CLIENTS

Alaska. If your advisor leaves our firm and your primary address is in Alaska, we will not allow your advisor to take your personal information to their new firm without your written consent.

California, North Dakota, and Vermont. We will not share your nonpublic personal information with nonaffiliated third parties without your consent, except as permitted by state law. For accounts with a California address, we treat you as having opted out of this sharing.

Vermont. If we share information with nonaffiliated companies under joint marketing agreements, we share only your name, address, other contact information, and information about our transactions or experiences with you.

Massachusetts. We maintain a written information security program with administrative, technical, and physical safeguards that meet Massachusetts requirements.

RETENTION

We keep client records for as long as required by securities regulations and our recordkeeping obligations. We keep website and marketing contact information for as long as it is useful for the purpose collected, or until you ask us to delete it, unless we are required to keep it longer.

Former clients. If you are no longer a client, we continue to protect your information as described in this policy. We share it only as described here, as required by law, or as needed to complete any remaining obligations to you.

CHILDREN

Our website and services are not directed to children under 13, and we do not knowingly collect personal information from them online.

GEOGRAPHIC SCOPE

We are based in Texas and provide our services only to clients in the United States. Our website is not directed to people outside the U.S., including in the European Union and United Kingdom.

LINKS TO OTHER WEBSITES

Our website links to sites we don't own or control, such as social media platforms. We are not responsible for their content or privacy practices, so please review their policies before sharing information with them.

CHANGES TO THIS POLICY

We will post any material changes to this policy on our website and update the effective date above. Clients may also receive an updated policy by mail or email.

CONTACT US

Questions about this policy or your information can be directed to:

Equity Comp Advisors
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(512) 617-1984