PRIVACY POLICY

Rev. 09/14/2020

FACTS	WHAT DOES FORMULAFOLIO INVESTMENTS, LLC AND RETIREMENT WEALTH ADVISORS, LLC DO WITH YOUR PERSONAL INFORMATION?

Why?	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. Please read this notice carefully to understand what we do.
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 • Contact information and mailing address • Account balances and transaction history • Investment experience and assets
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 customers' personal information; the reasons FormulaFolio Investments, LLC ("FFI")/Retirement Wealth Advisors, LLC ("RWA") chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does FFI/RWA 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 our affiliates to market to you	**NO**	**We don't share**
For nonaffiliates to market to you	**NO**	**We don't share**

To limit our sharing	Call our Advisors Service Team at 888-562-8880 **Please note:** If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

	However, you can contact us at any time to limit our sharing.
Questions?	Call 888-562-8880 or go to https://formulafolios.com or https://retirementwealthadvisors.com

Who we are	
Who is providing this notice?	FormulaFolio Investments, LLC and on behalf of our affiliate Retirement Wealth Advisors, LLC
What we do	
How does FFI/RWA 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. All nonpublic personal information is treated as strictly confidential and is not disclosed except to employees for the purpose of carrying out their responsibilities and to affiliated and nonaffiliated firms necessary to affect and administer custodial, brokerage, financial planning, legal, accounting, insurance or similar services requested and authorized by the client. Federal and state regulators also may review client records as permitted under law. FFI/RWA requires that our affiliates protect and restrict the use of client information to the same extent as FFI/RWA. Several practices are presently in place to ensure private client information is secured from public access: Secured Paper Files: Filing cabinets are locked outside of regular business hours. Any papers to be disposed which contain client information are shredded. FFI's site of business is also securely locked and electronically armed for fire and theft outside of regular business hours. Secured Electronic Files and Databases: FFI/RWA's computer system consists of a peer-to-peer network including a server, which stores all data related to client activities. All FFI/RWA computers are secured by a password system and all workstations are logged-off outside of regular business hours. Any electronic information accessible through the Internet is guarded by a secure firewall, and all FFI/RWA computers are regularly scanned for viruses. FFI/RWA backs-up all electronic data essential to its operations on a daily basis, with the prior day's backup maintained at a remote location in case of disaster. E-mail: From time to time, FFI/RWA will correspond with clients regarding private matters via electronic mail. FFI/RWA takes the precaution of verifying all client e-mail addresses, and limiting the content of communications to exclude sensitive elements such as account numbers, Tax ID numbers, and the like, unless authorized by the client. A Disclosure is included with every client e-mail which addresses any persons who may receive the message in error, along with instructions to contact our office and properly dispose of the data. E-mail communications to third parties which relate to our clients are conducted only as necessary to fulfill the obligations of the firm; however, no personal information pertaining specifically to our clients is shared with third parties without the expressed consent of the client. Phone: Client communications by phone are a daily task, and in situations where FFI/RWA initiates a call and reaches voicemail, the Policy is to limit the content of

information to exclude dollar amounts, account numbers, and any other sensitive information, unless authorized by the client. Conversations occurring with third parties related to our client situations are conducted only as necessary to fulfill the obligations of the firm; however, no personal information pertaining to clients is shared with third parties without the expressed consent of the client.

Regular Mail: It is FFI/RWA's policy to never mail personal and sensitive information regarding a client other than to the address kept on record at FFI/RWA, without the client's expressed instruction.

Other Internal Measures: In addition to these measures, FFI/RWA and its employees avoid storing nonpublic personal information in plain view in areas where it may be seen by third parties or discussing such information in public places where it may be overheard. FFI/RWA routinely reviews these practices to ensure the confidentiality, security and integrity of its nonpublic personal information.

External Security Measures (Security is a Partnership): We consider security to be a partnership between us and our clients. Taking some basic, preventative steps can help make your personal information more secure. Many involve plain common sense, like routinely checking your monthly statements to make sure reported account activity is legitimate. Other steps include:

(1) Keep your equipment updated:

- Keep your web browser and operating system updated and activate the computer firewall. Old software and browsers can be susceptible to attack
- Install anti-virus and anti-spyware software on all platforms (Windows, Apple and mobile devices)
- Check your security settings on your applications and web browser, and make sure they're strong

(2) Verify you're on a secure website:

- On most internet browsers, a lock will appear on the hyperlink bar or an HTTPS prior to the web link.

(3) Be cautious with public networks:

- Be cautious when using public computers. If you do use one, clear the browser's history (cache) and cookies before leaving.
- Only use wireless networks you trust or that are protected. Public Wi-Fi locations can be dangerous places to connect your devices. Pay attention to security warnings that pop up. Don't accept software updates when connected to a public Wi-Fi.

(4) Be strategic with login credentials and passwords:

- Don't use personal information such as your birthday as part of your login ID.
- Create a unique password for each financial institution you do business with and change it every six months. Don't share your passwords.

(5) Be alert to phishing scams:

- Beware of attempts to "phish" your information. These are often in the form of urgent-sounding emails where you might be encouraged to click on a link in order to update personal information. Even clicking on the link could potentially take you to a malicious website, where malware could infect your computer. We strongly recommend that you not click on suspicious links.

Definitions

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include Retirement Wealth Advisors, LLC, Brookstone Capital Management, LLC, Amerilife Financial Advisors, LLC, Altruist Financial LLC, Altruist, LLC
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. FormulaFolio Investments, LLC/Retirement Wealth Advisors, LLC does not share with nonaffiliates so they can market to you.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. FFI/RWA may jointly market with companies where a common interest lies. For example, they may jointly market with BlueLeaf regarding their WealthGuard product.

Other important information

Former Customers
If you are a former customer, these policies also apply to you; we treat your information with the same care as we do information about current customers.
State Laws
If you are a Vermont resident, we will automatically limit sharing of your information.