

NORTHROCK

Privacy Policy

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Introduction

Maintaining your trust and confidence is among our highest priorities. We recognize that protecting the privacy and security of our customers is an important responsibility. That is why we at NorthRock Partners want you to understand how we protect your privacy when we collect and use information about you, and the steps we take to safeguard that information.

Privacy Statement

NorthRock Partners LLC ("**NorthRock**" or "**We**") has adopted this 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.

This policy describes the types of information we may collect from you or you may provide when visiting our website ("Website") or using our services. This Privacy Policy describes how we collect, use, protect and manage information associated with personal data and what rights you have regarding this activity.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. By using the Website, you acknowledge and consent to adhere to this policy. If you do not agree with the terms of this Privacy Policy, then you should not access or use the Services, Website, or any other aspects of NorthRock Partners business.

This Privacy Policy applies to NorthRock Partners only and does not apply to third parties that integrate with the services through NorthRock Partners, or third-party products, services, or businesses who provide services under their own terms of use and privacy policy. When linking to any third-party site or features, our Privacy Policy no longer applies and you must read the terms of use, terms of service, and privacy policy of the third-party to see how your personal information will be handled on their website(s).

NorthRock Partners reserves the right to revise and update this policy from time to time to reflect our current practices and ensure compliance with applicable laws. We will revise our "Last Updated" date at the top of this Privacy Policy when material changes are posted. We recommend that you check this page periodically to stay informed of any changes.

Information We Collect About You and How We Collect It

We may collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, postal address, social security number, e-mail address, telephone number, account balances, assets, income, transaction history, tax return information, and any other identifier by which you may be contacted online or offline ("**personal information**");
- That is about you but individually does not identify you; and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

Information You Provide to Us

We may collect information from you directly when you provide it to us or use our services. For example, when you open an account, deposit money, seek advice, enter an investment advisory contract, share your investment or retirement portfolio or earnings. When you use our third-party services providers, such as our business partners, or other outside financial institutions or qualified custodians that may work with you.

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. We may also ask you for information when you enter a contest or promotion sponsored by us and when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses) if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Website.
- Your search queries on the Website.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through a web site, certain can be passively collected (that is, gathered without you actively providing the information) using various technologies and means, such as Internet Protocol (“IP”) addresses, cookies and navigational data collection. We use your IP address to diagnose problems with our server, report aggregate information, determine the fastest route for your computer to use in connecting to the Website, and administer and improve the Website.

Similarly, we may use Google Analytics to help us track and analyze usage of our content, using cookies, pixels and other tracking technologies.

A browser’s help menu or other browser instructions explains how to reduce the number of cookies received from us, or to delete cookies that have already been installed. Any Website user that disables or opts out of receiving cookies should be aware that some features and services that we provide may not work properly because we may not be able to recognize and associate you with your preferences/activity.

End Users can also learn more about cookies by visiting www.allaboutcookies.org which includes additional useful information on cookies and how to block cookies using several types of browsers.

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

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

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.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us or may be of interest to you.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account.
- To carry out our obligations and enforce our rights arising from any contracts entered between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual.

We may disclose personal information that we collect, or you provide as described in this privacy policy:

- To our subsidiaries and affiliates, for example, NorthRock Partners Tax Services, LLC.
- To contractors, service providers, and other third parties we use to support our business.
- 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 our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use [NorthRock Partners Terms Of Use](#) and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of NorthRock, our customers, or others.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. To request access to, correct or delete, or opt-out of certain personal information uses or disclosures, please send us an email at privacy@northrockpartners.com. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

Your California Privacy Rights

If you are a California resident, California law provides you with certain rights pursuant to the California Consumer Privacy Act (“CCPA”) and supporting amendments under the California Privacy Rights Act (“CPRA”). By providing you this notice, NorthRock Partners and its affiliates outline the rights of California residents with regard to personal information that we collect about you. The collection and use of your Personal Information for investment advisory, wealth management, financial planning, tax, estate planning and other related services on your behalf for your personal benefit is governed by the Gramm Leach Bliley Act (the “GLBA”), the California Financial Information Privacy Act (“CalFIPA”), or the Fair Credit Reporting Act (“FCRA”). For all information not provided for Financial Purposes and governed by the GLBA, this notice outlines our comprehensive compliance framework implemented in accordance with our compliance obligations under the CCPA and CPRA. Any terms defined in the CCPA and CPRA will have the same meaning when used in this notice. Capitalized terms used but not otherwise defined herein or in the CCPA / CPRA shall have the meanings given to such terms in our Privacy Policy Notice.

A. Types of Personal Information Subject to California Privacy Law

In accordance with California law, we may have collected the following categories of Personal Information within the preceding 12 months:

- Identifiers such as your name, alias, email address, mailing address, IP address, and online identifiers. We use this information to respond to new business solicitations regarding our services, setting up and managing accounts, performing financial advisory and wealth management services, and targeted marketing services.
- Certain categories of Personal Information are described in subdivision (e) of California Civil Code Section 1798.80, including but not limited to, name, address, telephone number, employment status, and, if you are a client, your financial information. We use this information to respond to new business solicitations regarding our services, setting up and managing accounts, performing financial advisory and wealth management services, and targeted marketing services.
- Protected classification characteristics under California or federal law. NorthRock Partners does not require you to provide protected classification characteristics. However, please carefully consider the information contained within new account applications and advisory agreements to ensure that you are not providing any protected classification characteristics that are not necessary for your engagement with us as your advisor. Dependent on the scope of services, a financial custodian may require certain information from you (the most common being birth date). We may collect this information on behalf of the custodian. Protected classification characteristics include your age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and

related medical conditions), sexual orientation, genetic information (including familial genetic information), and veteran or military status. NorthRock Partners and the third-party custodian may use this information to perform wealth management and financial advisory services tailored to meet your specific financial and life goals.

- Internet or other electronic network activity information, including cookie data and other information on your usage of our website. We use this information to provide targeted advertising based upon your interest in NorthRock Partners.
- Professional or employment-related information including any information provided in a resume/CV or job seeker profile. We use this information for the limited purpose of employment screening and hiring practices.

We may share each of these categories of Personal Information with our service providers to the extent necessary to perform administrative services for NorthRock Partners, if a client or client representative directs us to do so, or if we are compelled by law to disclose personal information, such as to government entities, credit bureaus or in response to subpoenas.

B. Your California Privacy Rights

If you are a resident of State of California, you have the following rights:

- **Right to Access Your Personal Information:** You have the right to request that we disclose the Personal Information that was collected about you in the 12 months before your request.
- **Right to Delete Your Personal Information:** You have the right to request that we delete the Personal Information that we collected from you.
- **Right to Opt-Out of the Sale of Your Personal Information:** You have a right to opt-out of the “Sale” of your Personal Information.
- **Right to Opt-Out of the Sharing of Your Personal Information:** You have a right to opt-out of the “Sharing” of your Personal Information for cross-contextual behavior advertising.
- **Right to Non-Discrimination:** You have the right not to be discriminated against on account of exercising the rights granted to you under the CCPA.

C. Exercising Your California Privacy Rights

Contact Information: To exercise the rights described above, please submit a verifiable request to privacy@northrockpartners.com

Right to Access / Delete:

We may not be able to delete your personal information if such information pertains to your employment or is required to be retained by law. Upon receipt of your deletion request, we will review and confirm if it is a verifiable request, and if so, we will delete (and direct our third-party suppliers to delete) your data. We may deny a deletion request, in whole or in part, if retaining the information or a portion of the information is required for NorthRock Partners and our third-party suppliers and contractors under an exemption called out in the CCPA or CPRA, including (if applicable):

- a. Information collected pursuant to the California Financial Information Policy as well as the Gramm Leach Bliley Act
- b. Information required to meet ongoing commercial obligation on your behalf;
- c. To comply with applicable laws, subpoenas, legal proceeding, or audit; or
- d. In order to improve our internal business practices, such as updating our website, improving cybersecurity, and any other solely internal business purpose reasonably anticipated within the context of our business relationship.

Your rights as a resident of the UK or EU/EEA:

- Rights of access, correction, restriction, and deletion: Individuals have the right to access their personal information held by the organization, correct any inaccuracies, and request deletion or restriction of further processing.
- Right to object: Individuals can object to the organization's use of their personal information for direct marketing purposes and in certain circumstances can object to the processing of their personal information, requesting deletion.
- Complaints: Individuals can make complaints regarding the organization's Privacy Policy by contacting privacy@northrockpartners.com. They can also lodge complaints with the relevant data protection authority in their country.

Your rights as a resident of Canada under the Personal Information Protection and Electronic Documents Act (PIPEDA):

The existing PIPEDA is Canada's main federal law protecting user privacy and governing how companies handle personal information. PIPEDA applies to private-sector organizations across Canada that collect, use or disclose personal information. This Privacy Policy outlines how NorthRock Partners gains access to your data indirectly and directly, how this information is used, shared and protected. Additionally, this Privacy Policy is maintained by NorthRock Partners and any communication regarding personal data questions or concerns should be directed to privacy@northrockpartners.com.

PIPEDA defines personal information as any information about an identifiable individual:

- Age, name, ID numbers, income, ethnic origin, blood type
- Opinions, evaluations, comments, social status, disciplinary actions
- Employee files, credit records, loan records, medical records

Data Security

Unfortunately, the transmission of information via the internet is not completely secure. Although we try to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Children

Our Website is not intended for children. We do not knowingly collect personal information from children without a legal guardian's consent. If we learn we have collected or received personal information from a child without verification of parental consent, we will delete that information and notify the legal guardian whenever possible. If you believe that a child may have provided us with personal information without legal guardian consent, please contact us at privacy@northrockpartners.com

Antidiscrimination

NorthRock Partners will not discriminate against you for exercising your privacy rights. Those rights include requests to access personal information, to delete information, and to opt out of the sale of personal information.

NorthRock Partners will not:

- Deny you goods or services for exercising your privacy rights
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties for exercising your privacy rights
- Provide you a different level or quality of goods or services for exercising your privacy rights
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services for exercising your privacy rights.

Please note that a legitimate denial of a request for information or deletion is not discriminatory

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this privacy policy to check for any changes.

Contact Information

Your privacy is important to us and we are happy to answer any questions. For questions regarding this Privacy Policy, please contact us at privacy@northrockpartners.com.