

COPPER FINANCIAL

MEMBER FINRA/SIPC

Rev. July 2021

FACTS WHAT DOES COPPER FINANCIAL (“CuFi”), 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 can include:
 - Social Security number - Investment experience and assets
 - Income - Account transactions and holdings

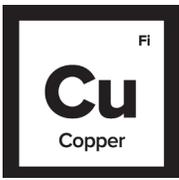
How? All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons CuFi chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does CuFi 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	Yes	No
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	Yes	Yes
For nonaffiliates to market to you	No	We don’t share

To limit our sharing Call us at (913) 905-3600 or (888) 695-3477.
Please note:
 If you are a *new* client, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our client, we continue to share your information as described in this notice.

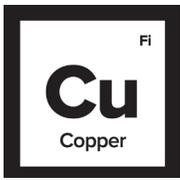
Questions? Call (913) 905-3600 or (888) 695-3477 or go to cu.financial/privacy.

Who we are
Who is providing this notice? Copper Financial (“CuFi”)



What we do	
How does CuFi protect my personal information?	<p>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.</p> <p>We also restrict access of nonpublic personal information about you to only those employees who need to know that information to provide products and services to you.</p>
How does CuFi collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> - Open an account - Apply for insurance - Seek advice about your investments and execute transactions - Move money in or out of your account - Tell us about your investment or retirement portfolio <p>We also collect your personal 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 from using your information to market to you - sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	<p>Your choices will apply to everyone on your account.</p>

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>Our affiliates include CommunityAmerica Credit Union; financial companies such as CommunityAmerica CUSO One, LLC; TruHome Solutions, LLC; CommunityAmerica Insurance Agency, LLC.</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>CuFi does not share with nonaffiliates so they can market to you.</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ▪ <i>Our joint marketing partners include financial services companies (such as credit unions with whom we have agreements to jointly market financial products)</i>



Other Important Information

Individuals in the European Union (“EU”):

In this section, we provide additional information relating to how we process Personal Information of individuals in the EU, in accordance with the GDPR. If you need more information or would like to exercise your rights under the GDPR, you may contact us at investments@cu.financial.

Basis for Processing

Our legal basis for collecting and using the Personal Information described in this Privacy Policy will depend on the Personal Information concerned and the context in which we collect it. We collect Personal Information from you:

- where we need it to perform a contract with you;
- where the processing is in our legitimate interests (including the purposes described, above, in How We Use Personal Information); or
- if we otherwise have your consent.

Your Privacy Rights

Depending on applicable law, you may have the right to:

- **Request access** to Personal Information about you.
- **Request correction** of the Personal Information that we hold about you.
- **Request erasure** of Personal Information about you. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of Personal Information about you where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing** of Personal Information about you. You can ask us to suspend the processing of Personal Information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of Personal Information to you or to a third party.
- **Withdraw consent** at any time where we are relying on consent to process Personal Information about you.

If you wish to exercise any of these applicable rights, please contact us at investments@cu.financial.

Depending on where you live, you may have a right to lodge a complaint with a supervisory authority or other regulatory agency if you believe that we have violated any of the rights concerning Personal Information. We encourage you to first reach out to us at investments@cu.financial, so we have an opportunity to address your concerns directly before you do so.

Transfers to the U.S.

If you are using the Sites from outside the United States, please be aware that Personal Information will be transferred to, stored, and processed in the United States. Although we take steps to provide adequate safeguards, the data protection laws of the United States might not be as comprehensive as those in your country.

We endeavor to apply suitable safeguards to protect the privacy and security of Personal Information transferred to us in the United States, and to use it only consistent with your relationship with us and the practices described in this Privacy Policy.