

# FACTS

## WHAT DOES CLEARSTEAD ADVISORS, LLC (“CLEARSTEAD”) DO WITH YOUR PERSONAL INFORMATION?

### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some 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?

#### What Information is Collected?

The types of personal information we collect and share depend on the product or service you have with us. We may collect information directly and indirectly from you, such as information you provide to us, information shared with us from third parties, and information collected relating to your device, browser and preferences. This information can include:

#### **Personal Information**, such as:

- Name
- Postal Address
- Email Address
- Social Security number/Tax-Identification Number

#### **Financial Information**, such as:

- Income
- Assets
- Account balances

#### **Device Information**, such as:

- Cookies
- Log Files
- IP Addresses

#### What are your rights?

Under certain circumstances, you may have rights in relation to your personal data, which may include the right to:

- Request access to your personal data;
- Request correction to your personal data;
- Request erasure of your personal data;
- Object to processing of your personal data;
- Request restriction of processing your personal data;
- Object to automated decision-making;
- Request transfer of your personal data;
- Withdraw your consent, and
- Not be discriminated against for exercising these rights.

### How?

#### How do we use your information?

- To provide, operate, maintain and improve our website and our services
- To communicate with you and with our partners to provide our services
- For limited marketing and promotional purposes

Reasons we can share your personal information	Has Clearstead Shared in the Last 12 Months?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes
<b>For our marketing purposes—</b> to offer our products and services to you	No
<b>For joint marketing with other financial companies</b>	No
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No
<b>For our affiliates to market to you</b>	No
<b>For non-affiliates to market to you</b>	No

### To limit our sharing

- Call 216-621-1090
- Visit us online: [www.clearstead.com](http://www.clearstead.com)
- Mail:  
Clearstead Advisors  
1100 Superior Avenue East, Suite 700  
Cleveland, OH 44114

**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 216-621-1090 or go to [www.clearstead.com](http://www.clearstead.com)

## Who we are

<b>Who is providing this notice?</b>	Clearstead Advisors, LLC
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## What we do

<b>How does Clearstead protect my personal information?</b>	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.
<b>How does Clearstead collect my personal information?</b>	<p>We collect the personal information provided by you, for example, when you</p> <ul style="list-style-type: none"> <li>▪ Enter into an investment advisory agreement</li> <li>▪ Seek financial advice</li> <li>▪ Open brokerage accounts that Clearstead has access</li> <li>▪ Make deposits or withdrawals from your account</li> <li>▪ Tell us about your investment or retirement portfolio</li> <li>▪ Provide tax documents</li> <li>▪ Provide information on non-investment assets</li> <li>▪ Give us your employment history</li> </ul>

## Definitions

<b>Affiliates</b>	<p>Companies related by common ownership, control, or other relationships. They can be financial and nonfinancial companies. These include:</p> <ul style="list-style-type: none"> <li>▪ Clearstead Trust, LLC, a wholly owned subsidiary of Clearstead and non-depository trust company, which operates in and is registered with the State of Maine. Client information could be shared if a Clearstead client decided to engage with Clearstead Trust.</li> <li>▪ Avalon Trust, LLC, a wholly owned subsidiary of Clearstead and non-depository trust company, which operates in and is registered with the State of New Mexico. Client information could be shared if a Clearstead client decided to engage with Avalon Trust.</li> <li>▪ EMB &amp; Co LLC, which is owned by a Clearstead employee, could be used to sell life insurance to clients of Clearstead.</li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ Clearstead does NOT share with non-affiliates</li> </ul>
<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

## Other important information

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