

# **European Union General Data Protection Regulation Privacy Notice**

This Privacy Notice describes Financial Synergies Wealth Advisors, Inc. (FSWA) treats personal data of individuals in the European Economic Area (EEA). The information in this Notice is provided pursuant to the European Union's General Data Protection Regulation (GDPR). FSWA's Data Protection Officer can be reached at +1-713-623-6600 or marie@finsyn.com.

### **Basis for and Purposes of Data Processing**

We collect and process your personal data when processing is necessary for the performance of our contract with you or your designee. Your contract is with FSWA, and we use the below GDPR-Compliant technologies to facilitate our business:

- <u>Calendly</u> provides appointment scheduling for our business. We only use the information you provide here as it relates to your appointment. We do not share it with any partners or other departments within our firm.
- <u>ActiveCampaign</u> provides certain marketing communication distributions. We use your personal information to send you email
  communications using this technology in accordance with our agreement with you.
- Wordpress is the platform our website is built on. We do not use cookies and do not store personal data that has been put into the webforms on the site, unless you instruct us to get in touch with you or email you from the webform.
- Google Analytics provides us insight into website use and traffic. We do not store this data, we simply monitor it monthly.
- Client Portal provides you access to personal, performance, and account data in accordance with our agreement with you.
- <u>Charles Schwab & Co., Inc.</u> is a custodian we use. You provide non-public information on their applications to open accounts which we manage on their platform.
- <u>Fidelity</u> is a custodian we use. You provide non-public information on their applications to open accounts which we manage on their platform.

We also process your personal data in order to comply with applicable U.S. laws. Basis for such processing are our legitimate interests, as we could not provide you with the required services unless we complied with U.S. laws.

We also process your personal data for marketing purposes based on your granted approval in our agreement, including sending you quarterly newsletters, weekly blog posts, and weekly summaries. You maintain the ability to opt out of these marketing communications at any time.

#### **Recipients of Personal Data**

We do not disclose any non-public personal information about our clients or former clients to anyone, except as permitted by law, or as permitted in our agreement with you, or if you request we share that information with third-parties.

#### **Data Storage Period**

The criteria used to determine extended data storage (such data will be kept confidential, unless otherwise required by law) depend on our responsibilities as a financial institution to comply with regulatory and legal requirements, along with corporate standards, prevent fraud and market abuse, and maintain cyber and information security and privacy protections, as well as data integrity and system controls.

## **Your GDPR Rights**

You can exercise or address these rights (subject to retention and other requirements under applicable law) by contacting our Data Protection Officer identified in the beginning of this Notice.

- 1. Access. You have the right to obtain access to your personal data.
- 2. Rectification. You have the right to ask for incorrect, inaccurate, or incomplete personal data to be corrected.
- 3. Erasure. You have the right to request that personal data be erased.
- 4. Restriction on processing. You have the right to request the restriction of the processing of your personal data in specific cases.
- 5. Objection to processing. You have the right to object to the processing of your personal data for any reason.
- 6. Portability. You have the right to receive your personal data.
- Withdrawal of consent. You have the right to withdraw consent from FSWA's marketing.
- 8. Lodging a complaint with a Supervisory Authority. You have the right to lodge a complaint with a Supervisory Authority within your Member State.