

## GDPR PRIVACY NOTICE

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*Our Commitment to Protect your Privacy*

Riggs Asset Management Company, Inc. (“Riggs,” “we,” “us,” or “our”) maintains physical, electronic, and procedural safeguards that comply with federal standards and the European Union’s (“EU”) General Data Protection Regulation (“GDPR”) to protect its clients’ nonpublic personal information (“Personal Information”) and to the extent applicable, information that may directly or indirectly identify you (“personal data”). For the purposes of this policy, and to the extent that GDPR applies, “Personal Information” shall also include “personal data.” Through this policy and its underlying procedures, Riggs attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

### ***How and What Types of Personal Information We Collect***

In order for Riggs to conduct its business with you, Riggs will collect Personal Information about you from the following sources: (1) Personal Information Riggs learns in performing investment management and wealth planning reviews on your behalf, whether personally or in writing, by telephone or otherwise; (2) Personal Information from transactions you have with us or others; (3) Personal Information Riggs receives, with your authorization, from third parties such as accountants, legal counsel, financial advisors, insurance agents, banking institutions, brokerage firms and others; and (4) Personal Information we collect from you when you visit our web site (“Site”) such as cookies or when you fill out a form on our Site. Please be aware that we are the sole owners of the Personal Information collected on our Site and will not sell or share this Personal Information with anyone unless otherwise specified.

The specific types of Personal Information Riggs collects includes, but is not limited to: client’s name, address, birthdate, social security number, bank account number(s), tax identification number, other government-issued identification numbers; other forms and documents client sends to Riggs, gender, information to create client’s online account (such as username and password).

### ***How We Use Your Personal Information***

Riggs will only use your Personal Information for the purpose of providing investment advisory services to you, including, but not limited to: (1) to monitor, audit, evaluate and otherwise administer our services; (2) to communicate with you; (3) in an effort to protect against fraud and identity theft; (4) comply with applicable legal requirements, relevant industry standards, contractual obligations, and our policies and terms; and (5) for other purposes as required or authorized by law, including other purposes for which you have provided your consent and our legitimate interests.

### ***Lawful Basis to Process Your Personal Information***

To lawfully process your Personal Information, Riggs retains one or more of the following lawful bases: (1) your voluntary consent in connection to providing you with Riggs’s investment services; (2) as necessary in order to fulfill certain contractual obligations; (3) as necessary to comply with applicable rules, laws, and regulations; and (4) as necessary in connection to the legitimate interests of our firm and/or a third party.

### ***Your Rights and Limits on Sharing***

In terms of your rights, to the extent permitted by applicable law, you may request: (1) to have your Personal Information corrected; (2) to opt out of receiving marketing communications at any time; (3) to file a complaint with an applicable government regulator; (4) to access the Personal Information Riggs holds about you; (5) to restrict or object to the processing of your Personal Information, or request that your Personal Information is erased; (6) to receive a copy of the Personal Information you have provided to Riggs, in a structured, commonly used format (known as “data portability”); (7) have a copy of your Personal Information provided to you or another controller where technically feasible; (8) to withdraw your consent to Personal Information that you provided to us voluntarily, or otherwise consented to its use.

To the extent U.S. Federal laws apply to your Personal Information, you have the right to limit only: (i) sharing for affiliates’ everyday business purposes; (ii) affiliates from using your Personal Information to market to you; and (iii) sharing for nonaffiliates to market to you. U.S. state laws and individual companies may give you additional rights to limit sharing.

Riggs may share your Personal Information for its everyday business purposes such as maintaining your account(s) or responding to court orders and legal investigations. For these types of purposes, you cannot limit sharing. We do not use your Personal Information to market our services to you. Moreover, Riggs does not have any “affiliate” companies nor shares your Personal Information with “nonaffiliated” companies for marketing purposes or for “joint marketing” purposes as those terms are defined under applicable U.S. Federal law.

As discussed above, we will endeavor to ensure your Personal Information is kept accurate, complete, up to date and relevant. Please let us know if any of your details change. If you feel your Personal Information is not accurate, complete or up to date, please notify us and we will take reasonable steps to ensure it is corrected. You can contact us using the details listed below.

In accordance with the foregoing, Riggs may take steps to verify your identity before granting you access to your Personal Information.

### ***How We May Share Your Personal Information with Third Parties***

It is the policy of Riggs to restrict access to all current and former clients’ Personal Information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services to the client. Riggs may disclose the client’s Personal Information if Riggs is: (1) previously authorized to disclose the Personal Information to individuals and/or entities not affiliated with Riggs, including, but not limited to the client’s other professional advisors and/or service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment advisor, account

custodian, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of Personal Information contained in any document completed by the client for processing and/or transmittal by Riggs in order to facilitate the commencement/ continuation/termination of a business relationship between the client and a nonaffiliated third party service provider (i.e., broker-dealer, investment advisor, account custodian, insurance company, etc.), including Personal Information contained in any document completed and/or executed by the client for Riggs (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

Riggs permits only authorized employees and affiliates who have signed a copy of Riggs's Privacy Policy to have access to client Personal Information. Employees violating Riggs's Privacy Policy will be subject to Riggs's disciplinary process. Additionally, whenever Riggs hires other organizations to provide services to Riggs's clients, Riggs will require them to sign confidentiality agreements and/or the Privacy Policy.

Riggs does not share your Personal Information with third parties so that they may directly market to you. Riggs does not have any affiliates.

#### ***How Long We Retain Your Personal Information***

To the extent permitted by applicable law, Riggs retains your Personal Information for the period necessary to serve the purposes for which Riggs obtained it. Riggs may also retain your Personal Information beyond such period in accordance with applicable laws, regulations, or another lawful basis, including but not limited to, compliance with our contractual obligations, legal obligations, regulatory obligations, legal claims, or another legitimate interest.

#### ***How We Maintain Accuracy of Your Personal Information***

Riggs will endeavor to ensure your Personal Information is kept accurate, complete, up to date and relevant. Please let Riggs know if any of your details change. If you feel your Personal Information is not accurate, complete or up to date, please notify us and we will take reasonable steps to ensure it is corrected. You can contact us using the details listed below.

#### ***Former Clients***

Our Privacy Policy continues to apply to all former clients in accordance with applicable laws, rules and regulations.

#### ***Data Controller***

To the extent GDPR applies, Riggs is the data controller for this policy located at the address below.

#### ***Additional Personal Information about Our Site***

For additional information about our Site policies, please refer to the section below titled, "Website Appendix."

***Changes to this Policy***

Riggs will provide each client with initial notice of the firm's current policy when the client relationship is established. Riggs shall also provide each such client with a new notice of the firm's current privacy policies at least annually. If, at any time, Riggs adopts material changes to its privacy policies, the firm shall provide each such client with a revised notice reflecting the new privacy policies.

Should you have any questions regarding the above, please contact:

Attention: Susan A. Shoemaker  
8 West Market Street, Suite 1120  
Wilkes-Barre, Pennsylvania 18701  
Telephone: 570-823-3383  
E-mail: [SShoemaker@riggsadvisors.com](mailto:SShoemaker@riggsadvisors.com)  
Website: <http://www.riggsadvisors.com/>

## **Website Appendix**

### **Security**

As our Site is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of Personal Information you communicate to us online. We also cannot guarantee that the Personal Information you supply will not be intercepted while being transmitted over the internet. Accordingly, any Personal Information or other information which you transmit to us online is transmitted at your own risk.

### **Links to Third-Party Websites**

As a convenience to you, Riggs may provide hyperlinks to websites operated by third parties. When you select these hyperlinks, you will be leaving our Site.

Riggs has no control over third party websites, their content, or security. Accordingly, when you access these third party websites it is at your own risk. We encourage you to read the associated privacy policies by such third party websites to learn more about their data privacy management practices. Riggs may, in its sole discretion, block links to our Site without prior notice.

### **Cookies**

We may use “cookies” to help us tailor our Site to better suit your needs (for example, we may use cookies to enable us to save any personal preferences indicated by you) and to provide a more effective route to various components of our Site.

For more information on how our firm utilizes cookies and how you may disable them, please refer to our Cookie Policy.

### **Do We Respond to Do Not Track Signals?**

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers and is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across Sites or online services.

We do track users across time or over multiple websites, we do receive, or respond to, browser do-not-track signals or other similar mechanisms. Similarly, some third party sites may also keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you.

To learn more about setting up a Do Not Track signal, please visit <https://allaboutdnt.com/>.

### **Children**

Our Site is not directed to children under the age of 18 years. By using our Site, you represent and warrant that you are at least 18 years old.

To the extent we have unintentionally collected any of your Personal Information on our Site from a person under the age of 18 years old, you may request and obtain removal of this Personal Information. To make such a request, please send an email with a detailed description of the specific content or information to the e-mail address above.

Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.