

Privacy Notice

We value the trust our clients have placed in us and are committed to the responsible management, use, and protection of their personal information. Please take a moment to review this Privacy Notice to learn how we protect your information and use it to service your account(s).

Information We Collect From You

Red Tortoise, LLC (“Red Tortoise”) must collect certain personally identifiable information about its customers to help it serve their financial needs, process transactions in their account(s), provide customer service, offer new products or services, and fulfill legal and regulatory requirements. The personally identifiable information that we gather during the normal course of doing business with you may include:

- Information provided to us or our affiliates by our customers (such as on account applications and related forms, in discussions with our employees and advisor representatives, or through our website).
- Information gathered from our internal files regarding the customer’s transaction history with us (such as products or services purchased, account balances, trading history, and payment history), as well as that provided by information service companies and consumer reporting agencies (such as transactions or credit relationships with unaffiliated third parties).
- Information provided by other unaffiliated third parties, including employers, associations, retirement plan benefit sponsors, and other institutions, if the customer transfers positions or funds to us.

This information may include “nonpublic, personal information,” which means information that is not readily known or accessible in the public realm, such as the customer’s social security number, birth date, net worth, assets, income, and medical information (if applying for insurance), as well as the fact that the customer has an account with us.

Sharing Information and the Information We Disclose

Pursuant to federal law, we may not disclose a customer’s nonpublic personal information without his/her prior consent, unless the disclosure is needed to:

- provide the services requested by the customer, including:
 - clearing, transferring, confirming, or reconciling transactions in the customer’s account(s); and
 - providing statements or other records regarding the status or value of the customer’s account(s);
- provide the customer with marketing materials regarding our products and/or services, as well as those offered pursuant to joint agreements with our affiliates or non-affiliated third parties, so long as all parties offering the products and/or services have agreed, in writing, to protect the confidentiality of the customer’s information and to not use it for any other purpose;
- enforce any of our rights, including the collection of any fees or other payments due;

- provide any of Red Tortoise’s affiliates with information regarding our operations, or as reasonably required pursuant to the proposed or actual sale, merger, transfer, or exchange of all, or a portion of, our business;
- comply with the request or requirements of regulatory and/or law enforcement organizations;
- respond to a subpoena or discovery request; or
- provide disclosures as otherwise permitted or required by law.

We may provide such information to Red Tortoise’s affiliates and/or unaffiliated financial or non-financial services providers (such as insurance companies, mutual fund companies, banks, investment firms, third-party administrators, clearing firms, and other third parties who assist us in providing account maintenance or customer service) as necessary pursuant to the exceptions listed above. We do not sell, share, or disclose your nonpublic personal information to unaffiliated third-party marketing companies.

Opting Out

Customers may request that we not disclose their nonpublic, personal information for any reason - other than one of the exceptions listed above.

For example, if an investment advisor representative who has serviced your account(s) terminates his/her registration with Red Tortoise, we may permit the advisor representative to share your contact information (name, address, phone number, email address, and account titles) with his/her new firm and use it to contact you for the purpose of requesting your permission to transfer your account(s) to that new firm. In that event, neither the investment advisor representative nor his/her new firm would be permitted to use your contact information for any other purpose or to obtain any other information regarding your accounts without your express written consent. However, because the disclosure of your contact information to an advisor representative’s new firm is not covered by any of the exceptions listed above, you have a right to request that we not disclose your information for this purpose.

To request that we not disclose your information for this or any purpose (other than those covered under the exceptions listed under “Sharing Information and the Information We Disclose” above), please call us at 833-666-1200. If we do not receive such a request from you within thirty (30) days of you opening an account, contracting for services, or receiving our annual privacy notice, we have the right to assume you do not object to the disclosure of your information for any reason permitted by federal law until you notify us to the contrary. (Please note that the laws of certain states may impose additional restrictions upon the disclosure of customers’ confidential information.)

Safeguarding Information

Red Tortoise recognizes the need to prevent unauthorized access to the information we collect, including information held in electronic format. Red Tortoise authorizes access to your nonpublic personal information only to personnel who need that information to serve you. We maintain physical, electronic, and procedural safeguards regarding your nonpublic, personal information to ensure that we comply with our own policy, industry practices, and federal and state regulations. If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

Accuracy

Red Tortoise strives to maintain accurate personal information in our client files at all times. However, as personal situations, facts and data change over time, we encourage our clients to provide feedback and updated information to help us meet our goals.

Questions

You do not have to contact us to benefit from our privacy protections; they apply automatically to all of our customers and former customers. If you have any questions after reading this privacy notice, we encourage you to contact us. You may call us at 833-666-1200 or write to Red Tortoise LLC, 5555 Glenridge Connector Suite 200, Atlanta, Georgia 30342.