
Waypoint Wealth Partners, Inc. DBA



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This Brochure provides information about the qualifications and business practices of Waypoint Wealth Partners ("WWP"). If you have any questions about the contents of this Brochure, please contact us at (877) 768-4802. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Waypoint Wealth Partners is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Waypoint Wealth Partners is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

Effective March 1, 2020, Courtney Hutchinson became Waypoint’s Chief Compliance Officer. Schedule A of Form ADV Part 1 has been updated accordingly.

The purpose of this page is to inform you of material changes since the last annual update to our brochure. If you are receiving this brochure for the first time, this section may not be relevant to you.

Waypoint Wealth Partners (“WWP”) reviews and updates our brochure at least annually to confirm that it remains current. Other than what is outlined above, WWP has not made any other material changes to the brochure since the last annual update dated March 19, 2019.

If you wish to receive a complete copy of our Form ADV Part 2A brochure, please contact Courtney Hutchinson, Chief Compliance Officer, at (877) 768-4802 or courtney@waypointwp.com. WWP’s Brochure is also available on our web site www.WaypointWP.com, also free of charge.

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Item 4 – Advisory Business

Waypoint Wealth Partners (“WWP”) has been providing investment advice since 2004 and became a Registered Investment Adviser with the SEC on June 17, 2008. WWP is a privately held company owned by the following principals:

BOWES, CHARLES, L.	Founding Partner
BRINTON, ANNETTE E.	Founding Partner
HUTCHINSON, COURTNEY B.	Chief Compliance Officer

Education and Business Standards

Persons providing advisory services (Investment Adviser Representatives) must be investment and financial planning professionals. Professional staff members must possess a BA, BS, or MBA degree and be either credentialed as a Certified Financial Planner, Certified Public Accountant, Chartered Life Underwriter, or enrolled in a course designed to achieve such designations or possess the equivalent experience. Other staff members bring appropriate skills and experiences.

Investment Management Services

WWP offers investment management services on a fee-only basis. WWP offers advice to clients regarding asset allocation and the selection of investments. WWP’s investment management services include designing, implementing, and continued monitoring of client accounts. WWP will invest the account on a fully discretionary basis, limited only by the client’s individual needs and any restrictions imposed on the account.

WWP may recommend other investment advisers to manage a certain portion of client assets. WWP will continue to provide advisory services to the client for the ongoing monitoring and review of the overall account performance. Factors that WWP will consider in recommending a particular sub-adviser include the sub-adviser’s management style, performance, reputation, financial strength, reporting, pricing, and research. WWP will also take the client’s stated investment objectives into account when determining whether a particular sub-adviser is appropriate. The client will pay the sub-adviser directly for their advisory services rendered. Fees paid to the sub-adviser are separate from and in addition to WWP’s management fees.

Wealth Management Services

WWP offers wealth management services as part of their investment management service offering. WWP’s wealth management offering includes the following:

- Understanding the client’s present circumstances by collecting and carefully considering relevant personal and financial data.
- Identifying the client’s goals, vision, values and concerns.

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- Providing recommendations for specific issues requested by the client which may include:
 - Preparing for or living in retirement
 - Investment strategies
 - Income tax planning
 - Stock compensation analysis and planning
 - Life, disability, long term care insurance
 - Family savings and cash flow planning
 - Education planning and funding
 - Charitable gifting
 - Employee benefits
 - Other issues as needed
 - As the client's financial plans are developed, WWP may help with implementing the plan, as requested by the client.
 - WWP also monitors and makes changes in the plan as circumstances change for the duration of the client's agreement with WWP. The client is always responsible for notifying WWP of changes in their personal circumstances on a timely basis.

The gathering of information, review of options, and plan development are all done carefully with the client in a series of in person meetings, telephone and by using electronic communication (e-mail) as appropriate. Proper planning is not a one-time event. Life circumstances change, goals change and available opportunities may change over time. Any plan will need to be adjusted and updated to reflect these changes or it may become outdated and irrelevant. The initial planning is only the beginning step in a life-long process.

WWP may provide more limited wealth management services for courtesy accounts, such as for the accounts of adult children of clients. WWP's wealth management services do not include preparation of income tax, gift or estate tax returns nor preparation of any legal documents, including wills or trusts. Investment Adviser Representatives at WWP are not practicing tax professionals or attorneys.

Types of Investments

WWP primarily utilizes mutual funds, exchange traded funds, and publicly traded REITs in managing client portfolios, and may additionally utilize individual stocks and bonds in particular client circumstances. WWP may also offer advice about any type of investment held in a client's portfolio at the beginning of the advisory relationship. The majority of investments recommended by WWP are in the form of no-load mutual funds, index funds, exchange traded funds or similar investment products. As a result of employee benefit perquisites from their position as an owner or executive of a company, some clients may own, be granted or may consider purchasing options in the shares of their company. WWP offers advice about such investment decisions, as well as about the sale or liquidation of these companies. The investment selection offered to clients may be limited by the knowledge and experience of the personnel of WWP and/or the resources available to it as a result of its relationships with custodians and other providers in the broader financial industry. In addition, as a result of these resources, certain investments may be available

to clients of WWP that might not be available to members of the public at large. WWP believes that the choices available under these restrictions is wide enough to effectively make the full range of investment options available that might be important for all but the rarest client. Suitable categories of investments are chosen according to the client's attitude about risk and need for capital appreciation or income production, with tax considerations of all transactions given appropriate weight.

WWP manages client accounts based on the investment strategy discussed below under Item 8. Individual securities are selected within each category when WWP believes their characteristics are most consistent with the objectives for the category they were chosen for. Risk factors of the different investments are considered, particularly in light of the client's stated risk tolerance. WWP makes investment decisions for clients based on information the client supplies about their financial situation, goals, and risk tolerance. WWP's recommendations/investment selections may not be suitable if the client does not provide WWP with accurate and complete information. It is the client's responsibility to keep WWP informed of any changes to their investment objectives or restrictions.

Clients may also request other restrictions on the account, such as when a client needs to keep a minimum level of cash in the account or does not want WWP to buy or sell specific securities or security types in the account. WWP reserves the right to not accept and/or terminate management of a client's account if WWP feels that the client-imposed restrictions would limit or prevent WWP from meeting or maintaining the client's investment strategy.

As of 12/31/2019, WWP's assets under management totaled:

Discretionary Assets	\$ 566,806,478
<u>Non-Discretionary Assets</u>	<u>\$ 0</u>
Total Assets	\$ 566,806,478

Item 5 – Fees and Compensation

WWP offers investment management services on a fee-only basis. Each Investment Management Agreement entered into with clients will disclose the fee schedule and any minimum quarterly fee clients will be charged, and may be different from the fee schedules and minimums clients will see described in this Brochure. Clients should be sure to review their Investment Management Agreement carefully before signing.

Fees and/or minimums may be negotiated or waived at WWP's sole discretion and in some cases, WWP may charge a client a negotiated flat fee rather than the fee range outlined below. The amount of the asset management fee is based on the total assets under management. The fee range and break points start from 1% to 0.25% annually, depending on the amount of assets to be managed. Accounts may be subject to a minimum quarterly fee.

Client fees will be calculated at the beginning of each calendar quarter based on the market value of the assets in the account on the last business day of the previous quarter. Client fees will be deducted automatically from their investment account(s) and will appear as a line item on the monthly or quarterly statement provided directly by their Custodian.

Prices and values for most assets are available from the Custodian through electronic download on a daily basis. However, daily prices may not be available for certain assets that are not held at WWP's recommended custodians. In these cases, the month end, quarter end, or annual asset values may be used in calculating the balance.

For new accounts, fees will be prorated as of the date that substantially all assets are received.

Any charges that may be assessed by the Custodian are paid directly by the client. All fees paid to WWP for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. The client should review both the fees charged by the funds, the Custodian and the fees charged by WWP to fully understand the total amount of fees the client will be required to pay, to whom, for what service, and to evaluate the advisory services being provided.

There is an initial one-time professional services fee charged upon the signing of the Investment Management Agreement that includes the initial and ongoing wealth management services described above. The professional services fee will vary according to the scope of services to be provided and will be quoted to each client in advance. If a client requests extraordinary planning services, WWP may charge separately for those services at an additional agreed upon fee. WWP will contact the client in advance if additional charges will apply.

WWP's fees are exclusive of charges imposed by Custodians, broker-dealers and third party investments such as brokerage commissions and transaction fees, custodian fees and fees charged by sub-advisers.

Item 12 further describes the factors that WWP considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

A client may terminate their agreement at any time but will be liable for the advisory fees earned up to the termination date based on the fee schedule in effect for that client. WWP will refund any fees that have been paid, but not earned, prorated for the period between the start of the billing period in question up to and including the date the client provides a notice of termination. A termination notice must be received in writing by WWP and is effective on the agreed upon date. There is never a penalty for terminating the agreement.

Item 6 – Performance-Based Fees and Side-By-Side Management

WWP does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

WWP provides portfolio management services to individuals, high net worth individuals, charitable institutions, foundations, and endowments.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis and Investment Strategies

WWP works with each client to develop an investment plan and appropriate asset allocation based on the client's individual circumstances. Depending on the client's financial needs and risk tolerance, client accounts will generally be allocated among equity and fixed income securities. WWP uses a long-term investment philosophy that seeks to capture the returns of the global capital markets. Client accounts are globally diversified across multiple dimensions including market capitalizations, regions, sectors and industries to reduce risk. WWP primarily uses institutional mutual funds and exchange traded funds to implement their strategies. WWP may also recommend the use of a sub-adviser to manage a portion of client assets. In these instances, WWP will provide the client with the disclosure brochure of the sub-adviser, which includes a description of the sub-adviser's investment strategy.

Sources of Information

WWP uses commercially available information and research from multiple investment companies to develop their strategies and recommendations. Company prepared materials and research releases prepared by others are also utilized. Such information may be obtainable in print, on computer media, via the internet or via some other electronic means. As an investment advisor, WWP also has the opportunity to access information from a variety of experts, whether through personal visits, telephone calls or at industry conferences or related meetings. Independent, third party registered investment advisors may also be employed to provide additional expertise in unique situations.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

The prices of securities held in client accounts and the income they generate may decline in response to certain events taking place around the world. These include events directly involving the issuers of securities held as underlying assets of mutual funds in a client's account, conditions affecting the general economy and overall market changes. Other contributing factors include local, regional or global political, social, or economic instability and governmental or governmental agency responses to economic conditions. Finally, currency, interest rate, and commodity price fluctuations may also affect security prices and income.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of WWP or the integrity of WWP's management. WWP has no history of legal or disciplinary events applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

WWP is required to disclose all industry affiliations and other industry-related activities. WWP has no affiliates and is not engaged in other financial industry activities.

Item 11 – Code of Ethics

WWP has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items and personal securities trading procedures, among other things. All supervised persons at WWP must acknowledge the terms of the Code of Ethics.

WWP's employees and persons associated with WWP are required to follow WWP's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of WWP may trade for their own accounts in securities which are recommended to and/or purchased for WWP's clients. Securities transactions on behalf of clients primarily consist of mutual funds, which do not trade but are issued and redeemed once daily at the fund's net asset value ("NAV"). Therefore, WWP believes that personal transactions in mutual funds do not present a conflict of interest to its clients. The Code of Ethics includes additional restrictions for WWP personnel in the event that non-mutual fund purchases or sales are made in their personal accounts. The Code is designed to assure clients that the personal securities transactions, activities and interests of the employees of WWP will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions, based on a determination that these would not materially interfere with the best interest of WWP's clients. In addition, the Code requires pre-clearance of certain transactions. It is the policy of WWP that no person employed by WWP may purchase or sell any security prior to a transaction being executed for an advisory account, preventing employees from benefiting from transactions placed on behalf of advisory accounts. Employee trading is continually monitored under the WWP Code of Ethics to reasonably prevent conflicts of interest between WWP and its clients.

WWP's clients or prospective clients may request a copy of WWP's Code of Ethics by contacting Courtney Hutchinson.

Item 12 – Brokerage Practices

As discussed in Item 8, WWP uses commercially available services, specifically financial publications and information services dealing with investment research and taxation to help develop its strategies and recommendations. WWP is required to disclose all relationships with investment research production companies that could result in compensation or benefits paid for by client commissions (called “soft dollars”) to WWP that could present a conflict of interest. WWP does not receive compensation in the form of research or any other soft dollar benefits.

Broker Recommendation

WWP requires each client to open one or more brokerage accounts with a specified independent company that provides account custody and brokerage services, commonly referred to as a “Custodian”. To perform appropriate transactions necessary to provide investment management services, WWP may from time to time establish non-binding relationships with one or more Custodians. WWP typically requires clients to maintain their assets with and place transactions through Fidelity Brokerage Services, LLC (“Fidelity”) or Charles Schwab & Co., Inc. (“Schwab”) as broker, each a registered broker-dealer, member of FINRA/SIPC. The client will enter into a separate agreement with the Custodian to custody the assets. WWP is independently owned and operated and is not affiliated with any Custodian. The commission rates charged by Custodians may be higher than those obtainable from other brokers. While commission rates are an important factor in custodian/broker selection, WWP may consider a number of factors in addition to commission rates. These include, for example, reputation, financial strength and stability, efficiency of execution and error resolution, willingness to execute difficult transactions, selection of mutual funds offered, on-line access to computerized data regarding client accounts, custody, record keeping or other similar services, as well as other matters involved in the receipt of general brokerage services. The Custodian may provide WWP with access to their institutional trading and custody services, which are typically not available to retail investors. The benefits WWP receives under this arrangement are described in Item 14. All WWP clients with assets held by a Custodian may benefit from this arrangement. A sub-adviser may direct transactions through a broker other than the Custodian where client assets are held. In these instances, the client will be charged a trade-away fee. The sub-adviser takes this fee into consideration when directing transactions. For more information, clients should review the ADV 2 of the sub-adviser.

Cross Transactions

It is WWP’s policy that we will not affect any principal or agency cross securities transactions for client accounts. WWP will also not cross trades between client accounts. Sub-advisers utilized for some client accounts may conduct cross trades. For more information regarding the sub-adviser’s policies, clients should contact WWP and review the ADV 2 of the sub-adviser.

Trade Aggregation

Currently, while not prohibited from aggregating client orders, WWP typically manages and trades accounts on an individual basis. Aggregating trades seeks to benefit clients by purchasing or selling in larger blocks in an attempt to take advantage of better pricing or lower trading costs. Because WWP primarily uses mutual funds to manage client accounts, we do not feel that clients are at a disadvantage. Mutual funds are priced once daily. As the daily price is the same for each investor, WWP has no opportunity to obtain better pricing through aggregating even if trades of the same fund for multiple clients are placed within a single order. Additionally, the broker-dealer/custodians charge each account an individual transaction fee regardless of whether WWP aggregates or not, which prevents WWP from lowering trading costs through aggregation. Clients should refer to the ADV of the sub-adviser for the sub-adviser's practices on trade aggregation.

Item 13 – Review of Accounts

Client accounts are carefully monitored and reviewed by the Investment Advisor Representative responsible for the account for alignment with the target asset allocation and the client's stated circumstances on an ongoing basis, at least quarterly, and more frequently in times of unstable markets or changing economic conditions.

Client Communication

Client communications occur at several levels:

- Trade confirmations and statements of accounts document all investment transactions and are provided directly to the client by the broker-dealer and/or Custodian.
- Monthly statements are prepared and distributed by the Custodian holding the assets.
- Quarterly performance reports are provided to all clients via a personalized, secure on-line portal.
- Client meetings are generally held at least annually to review the client's account and determine if there have been any material changes in the client's financial goals.
- Meetings, telephone calls, and emails typically occur throughout the year as circumstances warrant.

Courtesy accounts do not receive reports and meetings from WWP separate from the reports and meetings provided to the client.

Item 14 – Client Referrals and Other Compensation

Client Referrals

WWP does not accept referral fees. WWP may, from time to time, compensate either directly or indirectly, any person (defined as a natural person or a company) for client referrals. If a client is introduced to WWP by either an unaffiliated or affiliated solicitor, WWP may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940. If the client is introduced to WWP by an unaffiliated solicitor, the solicitor, at the time of the solicitation, must disclose the nature of the solicitor relationship and must provide each prospective client with a copy of WWP's written disclosure statement as set forth in this Part 2 of Form ADV, together with a copy of the written disclosure statement from the solicitor to the client disclosing the terms and conditions of the arrangement between WWP and the solicitor, including the compensation to be received by the solicitor from WWP. Any affiliated solicitor of WWP must disclose the nature of the relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of WWP's written disclosure statement as set forth in Part 2 of Form ADV.

Additional Compensation

Custodian services are generally available to independent investment advisors on an unsolicited basis, at no charge to them so long as WWP maintains a minimum amount of its clients' assets in accounts with the Custodian. Some of the services provided by Custodians include brokerage, custody, research and access to certain mutual funds and other investments that may not otherwise be available to non-institutional or retail investors or would require a significantly higher minimum initial investment. In some cases, the Custodian does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for security trades that are executed through the Custodian. The Custodian may also make other products and services available to WWP that benefit WWP but may not benefit its clients' accounts. Some of these other products and services may assist WWP in managing and administering clients' accounts. These may include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitation of trade execution, providing research pricing information and other market data, assisting with back-office functions, recordkeeping and client reporting. Many of these services may be used to service all or a substantial number of WWP's accounts, including accounts not maintained at the Custodian providing the services. The Custodian may also make available to WWP other services intended to help WWP manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, the Custodian may make available, arrange and/or pay for these types of services rendered to WWP by other independent third parties. While as a fiduciary, WWP endeavors to act in its clients' best interests, WWP's recommendation that its clients maintain their assets in accounts at a certain Custodian may be based in part on the benefit to WWP of the availability of some of the products and services discussed in this Brochure.

In addition, due to the fact that WWP does not directly pay for these services, including any research received, it may be construed as receipt of an economic benefit by WWP and therefore, a conflict of interest between WWP and the client.

Item 15 – Custody

WWP does not maintain physical custody of customer funds or securities.

WWP is deemed to have limited custody of some of its clients' funds or securities when the clients authorize WWP to deduct its management fees directly from the client's account. A qualified Custodian (generally a broker-dealer, bank, trust company, or other financial institution) holds clients' funds and securities. WWP is also deemed to have custody of clients' funds or securities when clients have standing authorizations with their custodian to move money from a client's account to a third-party ("SLOA") and under that SLOA authorizes WWP to designate the amount or timing of transfers with the custodian. The SEC has set forth a set of standards intended to protect client assets in such situations, which WWP follows.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified Custodian that holds and maintains a client's investment assets. The statements will reflect the client's funds and securities held with the qualified Custodian as well as any transactions that occurred in the account, including the deduction of WWP's fee. WWP urges clients to carefully review such statements and compare such official Custodian records to the account statements that WWP may provide to clients. WWP statements may vary from Custodian statements based on accounting procedures, reporting dates or valuation methodologies of certain securities. Clients with any questions about their statements should contact WWP at the address or phone number on the cover of this brochure. Clients who do not receive their statement from their qualified Custodian at least quarterly should also notify WWP.

Item 16 – Investment Discretion

WWP will typically have full discretion with respect to the selection, amount, purchase and sale of securities without requesting and receiving specific advance client consent. WWP will only manage accounts on a non-discretionary basis in rare and unique circumstances and at the sole discretion of WWP.

WWP usually receives discretionary authority from the client at the beginning of an advisory relationship to select the identity and amount of securities to be bought or sold. This authority is granted in the investment management agreement the client signs. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, WWP observes the investment policies, limitations and restrictions of the clients for which it advises.

Item 17 – Voting Client Securities

Proxy Voting

WWP's policy is to not vote proxies on behalf of its clients. Clients retain the right and authority to vote securities for their accounts and therefore, WWP shall have no obligation or authority to take any action or render any advice with respect to the voting of proxies solicited by or with respect to issuers of securities presently or formerly held in a client's account. If the account is an ERISA account (pension, retirement or employee benefit account), the plan delegates such authority to another named fiduciary. If the account is managed by a sub-adviser, proxies for those securities will be voted by the client or by the sub-adviser. Otherwise, the obligation to vote client proxies shall, at all times, rest with the client. Clients will receive their proxies or other solicitations directly from their custodian or a transfer agent. Clients may call WWP if they have questions about a particular solicitation, but WWP shall not be deemed to have proxy voting authority solely as a result of providing advice or information about a particular proxy vote to a client. Proxies issued on securities held by a registered investment company (i.e. mutual fund) are generally voted by the investment adviser advisor that manages the assets of the mutual fund.

Class Actions

WWP does not instruct or give advice to clients on whether or not to participate as a member of class action lawsuits and will not automatically file claims on the client's behalf. However, if a client notifies WWP that they wish to participate in a class action, WWP will provide the client with any transaction information pertaining to the client's account needed for the client to file a proof of claim in a class action.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide clients with certain financial information or disclosures about WWP's financial condition. WWP has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

FACTS

WHAT DOES WAYPOINT WEALTH PARTNERS, INC. (“WWP”) 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 and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- account balances and transaction history
- assets and risk tolerance

When you are *no longer* our customer, we continue to share your information as described in this notice.

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 WWP chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does WWP share?	Can you limit this sharing?
For our everyday business purposes - as permitted by law	YES	NO
For our marketing purposes - to offer our products and services to you	YES	NO
For joint marketing with other financial companies	NO	We Don’t Share
For our affiliates’ everyday business purposes - information about your transactions and experiences	NO	We Don’t Share
For our affiliates’ everyday business purposes - information about your creditworthiness	NO	We Don’t Share
For nonaffiliates to market to you	NO	We Don’t Share

Questions?

Call Courtney Hutchinson at 877-768-4802.

WHO WE ARE

Who is providing this notice?

Waypoint Wealth Partners, Inc. ("WWP")

WHAT WE DO

How does WWP protect my personal information?

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.

How does WWP collect my personal information?

We collect your personal information, for example, when you

- seek advice about your investments
- enter into an investment advisory contract
- tell us about your investment or retirement portfolio
- tell us about your investment or retirement earnings
- give us your contact information

We also collect your personal information from other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only:

- 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

State laws and individual companies may give you additional rights to limit sharing.

DEFINITIONS

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *WWP has no affiliates*

Nonaffiliates

Companies not related by common ownership or control. They can be financial and non-financial companies.

- *WWP does not share with nonaffiliates so they can market to you*

Joint Marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *WWP doesn't jointly market*

OTHER IMPORTANT INFORMATION

Information for California Customers

In response to a California law, we automatically treat accounts with California billing addresses as if you do not want to disclose personal information about you to non-affiliated third parties except as permitted by the applicable California law. We will also limit the sharing of personal information about you with our affiliates to comply with all California privacy laws that apply to us.