



**AmericaFirst**  
WEALTH MANAGEMENT

275 Wiregrass Parkway  
West Henrietta, NY 14586  
(585) 325-3610

**August 14, 2023**

This Brochure provides information about the qualifications and business practices of DSS Wealth Management, Inc. If you have any questions about the contents of this Brochure, please contact James Monaghan, at (585) 325-3610 or (914) 420-1249. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

We are a registered investment adviser. However, registration of an investment adviser does not imply any level of skill or training. The oral or written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

Additional information about DSS Wealth Management, Inc is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - Summary of Material Changes**

- On April 25, 2023, Rick Gonsalves resigned his roles as President & Portfolio Manager of DSS Wealth Management and DSS-AmericaFirst Quantitative Funds.
- On May 1, 2023, Daniel Lew joined DSS Wealth Management as Chief Investment Officer & Portfolio Manager. Daniel Lew is a seasoned investment professional with over 30 years of experience managing portfolios, performing security analysis, and advising institutional clients. Mr. Lew has held senior investment management positions at AIG SunAmerica, Strong Capital, John Hsu Capital, Citizens Advisers, and Equitable Capital. He has also served as investment consultant to institutional funds at William M. Mercer and at RogersCasey. Mr. Lew has also been an entrepreneur and was the first uBreakiFix franchisee in Connecticut where he opened three locations. Mr. Lew has earned the right to use the CFA designation and he has a B.S. in Computer Science from Columbia University School of Engineering and Applied Science, and an MBA in finance from NYU, Stern Graduate School of Business.
- Mr. Lew will have portfolio management responsibilities for all 4 DSS-AmericaFirst mutual funds.
- On August 7, 2023, James Monaghan joined DSS Wealth Management as Chief Compliance Officer & Chief Operating Officer. Mr. Monaghan has over 25 years working in the mutual fund industry holding several leadership positions at industry leading financial firms. Mr. Monaghan started his career at Mutual of America working as an analyst in fund operations. After eight years at Mutual of America, he earned a position as a trader. After Mutual of America, Mr. Monaghan joined Chase Bank and traded short-term fixed income instruments. After Chase Bank, Mr. Monaghan joined AIG SunAmerica and was there for over 25 years. At AIG SunAmerica, Mr. Monaghan held positions in portfolio research, trading, and operations before being promoted to run the trading desk at AIG's \$50 billion mutual fund company, SunAmerica Asset Management. After SunAmerica Asset Management was sold to Touchstone Investments, Mr. Monaghan joined Bloomberg, Inc. in New York City as an account manager, specializing in order management and compliance platforms. Jim graduated from the State University of New York College at Oneonta with a B.A. in economics. Mr. Monaghan holds the Chartered Market Technician designation (CMT) and is a member of the Market Technicians Association.
- On August 10, 2023, Robert Roach, was replaced as Chief Compliance Officer by James Monaghan.

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## **Item 4 - Advisory Business**

DSS Wealth Management, Inc “DSSWM,” “the Company,” “we,” or “us”) is a privately held company formed in 2021. Frank D. Heuszel is our Chief Executive Officer of both the Company and Document Security Systems. The company is a wholly owned subsidiary of DSS Securities Inc. Document Security Systems, Inc. is the controlling shareholder of DSS Securities Inc.

DSSWM is the investment advisor to the DSS-AmericaFirst Quantitative Funds. The investment strategies utilize data driven, quantitative models to support our investment decisions. DSSWM’s underlying strategies are researched and comprehensively evaluated before implementation.

DSSWM seeks to manage the following four affiliated open-ended mutual funds:

- AmericaFirst Large Cap Share Buyback Fund
- AmericaFirst Risk On/Risk Off Fund
- AmericaFirst Defensive Growth Fund
- AmericaFirst Income Fund

Additional information about each fund and the prospectuses of each fund may be found at [www.AmericaFirstFunds.com](http://www.AmericaFirstFunds.com).

The Executive Management Team of DSSWM:

- Document Security Systems Executive Team:
  - Frank D. Heuszel, CEO
  - Jason Grady, COO
  - Todd D. Macko, CFO
- DSS Wealth Management, Inc.
  - Daniel Lew, Chief Investment Officer & Portfolio Manager
  - James Monaghan, Chief Compliance Officer & Chief Operating Officer

As of 12/31/2022, the company has approximately \$32.5 million of assets under management and one client.

## **Item 5 - Fees and Compensation**

At present, each DSS-AmericaFirst mutual fund pays an advisory fee based on the individual fund’s average daily net assets. You are urged to reference the current prospectus of each fund, but the advisory fee range from 1.00 – 1.50%.

If you are invested in AmericaFirst funds or other mutual funds, fees incurred will include management fees and other internal fees commonly associated with mutual funds. Such fees are specifically stated and disclosed in the current prospectus. Mutual funds may also charge a sales load in accordance with the fund’s prospectus. There exist other mutual funds which may offer similar strategies to the AmericaFirst funds, and these funds may offer lower fees and expenses than the AmericaFirst funds.

## **Item 6 - Performance-Based Fees and Side-by-Side Management**

We do not charge performance-based fees. Our advisory fees are not based on a share of the capital gains you earn or on the capital appreciation of assets in your account.

## **Item 7 - Types of Clients**

Our primary client is the DSS-AmericaFirst Quantitative Funds.

## **Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss**

The investment strategy of each of DSS-AmericaFirst funds is described below:

### **AmericaFirst Income Fund**

The Fund seeks to achieve its investment objective by investing in a portfolio of high income securities that may include (but not limited to) high-dividend stocks, preferred stocks, master limited partnerships (“MLPs”), convertible preferred stock, convertible bonds, real estate investment trusts (“REITs”), and bonds (including high-yield securities, commonly called “junk bonds”) selected by applying a multi-factor and rules-based model. The Fund may rebalance a significant portion of its holdings on a quarterly or more frequent basis based upon the selections of the model. The Fund may hold significantly higher than normal short-term cash positions during rebalancing or when market conditions warrant. The Fund may employ seasonal and/or market timing trading strategies based upon the Advisor’s algorithms. The Fund invests without restriction as to issuer capitalization, maturity, credit quality or whether the security is foreign or domestic. Foreign bonds may include both domestic and sovereign bonds. Additionally, the Fund may invest in the shares of investment companies that are exchange-traded funds (“ETFs”) that invest in securities that are consistent with the Fund’s investment objective and policies. These ETFs include those with inverse market exposure and leveraged ETFs. Inverse ETFs are designed to produce results opposite to market direction, which may serve to hedge portfolio investments. Inverse ETFs seek daily investment results, before fees and expenses, which correspond to the inverse (opposite) of the daily performance of a specific benchmark, such as the S&P 500 Index. The Portfolio Manager does not rebalance inverse ETFs positions daily to adjust for daily changes in the reference index. Leveraged ETFs seek to use financial derivatives and debt to amplify the returns of an underlying index. The Fund may also sell short equity securities from any industry in an attempt to reduce volatility and risk in unfavorable market conditions.

### **AmericaFirst Defensive Growth Fund**

The Fund seeks to achieve its investment objective by investing, under normal circumstances, a range of approximately 70% to 100% of its net assets in a portfolio of defensive opportunities. Equity securities include common stock. The Fund may not meet its target range during rebalancing transitions as well as upon the discretion of the Fund’s investment advisor. The Fund utilizes a multi-factor and rules-based strategy.

The Fund seeks to select stocks of historically “defensive” industries. Industries include (but are not limited to)

Consumer Staples (example: food products, cosmetics & toiletries, brewing, soft drinks, food processing and retail), Healthcare (pharmaceuticals, health care services, medical supplies and equipment), Aerospace & Defense (companies engaged in the production of spacecraft and commercial military and private aircraft), Railroads, and Utilities (electric, natural gas and water utilities as well as telephone services). Under normal market conditions, the Fund may overweight portfolio investments primarily in securities in the consumer staples and healthcare sectors which represent numerous industries. These sectors are comprised of companies that are defensive in nature and are selected in an effort to provide capital appreciation while reducing overall portfolio volatility.

The Fund may also execute a portion of its equity strategy by investing in ETFs, including those with inverse market exposure and leveraged ETFs. Inverse ETFs are designed to produce results opposite to market direction, which may serve to hedge portfolio investments. Inverse ETFs seek daily investment results, before fees and expenses, which correspond to the inverse (opposite) of the daily performance of a specific benchmark, such as the S&P 500 Index. The PM does not rebalance inverse ETFs positions daily to adjust for daily changes in the reference index. Leveraged ETFs seek to use financial derivatives and debt to amplify the returns of an underlying index.

The Fund may also sell short equity securities from any industry in an attempt to reduce volatility and risk in unfavorable market conditions. Depending upon market conditions and prospects as determined by the Advisor's quantitative models, the Fund may target having 0% to 30% of its assets in short positions under normal market conditions. The Fund may target having approximately 70% to 100% of its assets in long positions under normal market conditions. The Fund will invest in securities of companies regardless of market capitalization. The Fund will rebalance a significant portion of its holdings, based on the Advisor's quantitative models, on a monthly or more frequent basis. The Fund may hold significantly higher than normal short-term cash positions during rebalancing or when market conditions warrant. The Fund may employ seasonal and/or market timing trading strategies based upon the Advisor's quantitative models.

### AmericaFirst Large Cap Share Buyback Fund

The Fund invests primarily in the common stocks of large capitalization domestic companies that have engaged in repurchasing a portion of the company's outstanding shares over the last year. Under normal conditions, the Fund will invest at least 80% of the Fund's net assets, plus any borrowings for investment purposes, in large capitalization companies, which the Advisor defines as companies with a market capitalization of \$10 billion or more at the time of purchase, which have purchased their own stock over the last year. While the Fund will primarily invest in large capitalization companies, it may also invest in small or medium capitalization companies from time to time and when the large capitalization companies in which the Fund invests lose capitalization between purchase and rebalancing of the portfolio.

The Fund's investment advisor (the "Advisor"), applies a multi-factor and rules-based strategy to select from a universe of large capitalization companies that have engaged in share repurchase programs over the last twelve months. The portfolio is rebalanced as often as every month, which could result in high portfolio turnover.

The Fund may also execute a portion of its equity strategy by investing in ETFs, including those with inverse market exposure and leveraged ETFs. Inverse ETFs are designed to produce results opposite to market direction, which may serve to hedge portfolio investments. Inverse ETFs seek daily investment results, before fees and expenses, which correspond to the inverse (opposite) of the daily performance of a specific benchmark, such as the S&P 500 Index. The PM does not rebalance inverse ETFs positions daily to adjust for daily changes in the reference index. Leveraged ETFs seek to use financial derivatives and debt to amplify the returns of an underlying index.

The Fund is classified as "non-diversified" for purposes of the Investment Company Act of 1940 (the "1940 Act"), which means a relatively high percentage of the Fund's assets may be invested in the securities of a limited

number of companies.

### AmericaFirst Risk On/Risk Off Fund

The Fund seeks to achieve its investment objective through long positions in global equity markets and other tradeable asset classes based on a multi-factor and rules-based strategy.

The Fund's portfolio of securities may include common stocks of foreign and domestic companies, preferred securities, of domestic or foreign issuers, U.S. Treasury bonds, exchange-traded portfolios ("Exchange Traded Portfolios"), master limited partnerships ("MLPs"), and real estate investment trusts ("REITs"). For purposes of the strategy, the Fund defines Exchange Traded Portfolios to include exchange traded funds ("ETFs") that issue shares that are approved for listing and trading on a national securities exchange. It is possible that the Fund may not include all these types of securities and may only include one of these types of securities in the portfolio at any given time.

### Risk of Loss

All investment programs and strategies, including those offered by DSSWM, involve a risk of loss that clients should be prepared to accept. The risk factors for each of the DSSWM funds or strategies, as applicable, are discussed further below.

**ETF Risk (All Funds)** - When the Fund invests in an ETF, it will indirectly bear its proportionate share of any fees and expenses payable directly by the ETF. Therefore, the Fund will incur higher expenses, many of which may be duplicative. In addition, the Fund may be affected by losses of the ETFs and the level of risk arising from the investment practices of the ETFs (such as the use of leverage by the funds). The Fund has no control over the investments and related risks taken by the ETFs in which it invests. Additionally, investments in ETFs are also subject to the following risks: (i) the market price of an ETF's shares may trade above or below their net asset value; (ii) an active trading market for an ETF's shares may not develop or be maintained; or (iii) trading of an ETF's shares may be halted for a number of reasons.

**Inverse ETF Risk (All Funds)** - Inverse or "short" ETFs seek to deliver returns that are opposite of the return of a benchmark (e.g., if the benchmark goes up by 1%, the ETF will go down by 1%), typically using a combination of derivative strategies. Inverse ETFs contain all the risks that regular ETFs present. Because inverse ETFs typically seek to obtain their objective daily, holding inverse ETFs for longer than a day may produce unexpected results particularly when the benchmark index experiences large difficulties. Unexpected results include an Inverse ETF failing to rise in price despite a drop in the reference index. Inverse ETFs may also be leveraged. Inverse ETFs contain all the risks that regular ETFs present.

**Leveraged ETF Risk (All Funds)** - Investing in leveraged ETFs will amplify the Fund's gains and losses. Most leveraged ETFs "reset" daily. Because of compounding, their performance over longer periods of time can differ significantly from the performance of their underlying index or benchmark during the same period.

**Management Risk (All Funds)** - The portfolio manager's judgments about the strategy as well as the attractiveness, value and potential appreciation of particular asset classes, sectors, or other securities in which the Fund invests may prove to be incorrect and there is no guarantee that the portfolio manager's judgment will produce the desired results.

**Security Risk (All Funds)** - The value of the Fund may decrease in response to the activities and financial prospects of an individual security in the Fund's portfolio.

**Small and Medium (Mid) Capitalization Stock Risk (All Funds)** - The earnings and prospects of small and mid-

capitalization companies are more volatile than larger companies, they may experience higher failure rates than larger companies and normally have a lower trading volume than larger companies, which may tend to make their market price fall more disproportionately than larger companies in response to selling pressures.

**Stock Market Risk (All Funds)** - Overall stock market risks may also affect the value of the Fund. Factors such as domestic economic growth and market conditions, interest rate levels and political events affect the securities markets.

**Tracking Risk (All Funds)** - Investment in the Fund should be made with the understanding that the acquired funds, such as ETFs, in which the Fund invests will not be able to replicate exactly the performance of the indices or sector they track, if any, because the total return generated by the securities will be reduced by transaction costs incurred in adjusting the actual balance of the securities.

**Turnover Risk (All Funds)** - Because the Fund will rebalance its holdings, the Fund may have portfolio turnover rates significantly more than 100%. Increased portfolio turnover causes the Fund to incur higher brokerage costs, which may adversely affect the Fund's performance and may produce increased taxable distributions.

**Credit Risk (Income, Risk-on-Risk off, and Defensive Growth Funds)** - There is a risk that issuers and counterparties will not make payments on securities and other investments held by the Fund, resulting in losses to the Fund.

**Fixed Income Risk (Income, Risk-on-Risk off, and Defensive Growth Funds)** - When the Fund invests in equity securities that may convert to fixed income securities, the value of your investment in the Fund will fluctuate with changes in interest rates. Other risk factors include credit risk (the debtor may default) and prepayment risk (the debtor may pay its obligation early, reducing the amount of interest payments).

**High-Yield Risk (Income and Risk-on-Risk off Funds)** - High-yield, high-risk securities, commonly called "junk bonds," are considered speculative. While providing greater income than investments in higher-quality securities, these lower-quality securities will involve greater risk of principal and income than higher-quality securities.

**Interest Rate Risk (Income and Risk-on-Risk off Funds)** - Interest rate risk is the risk that bond prices overall, including the prices of securities held by the Fund, will decline over short or even long periods of time due to rising interest rates. Bonds with longer maturities tend to be more sensitive to interest rates than bonds with shorter maturities. Recently, interest rates have been historically low. Current conditions may result in a rise in interest rates. As a result, for the present, interest rate risk may be heightened.

**Preferred Stock Risk (Income Fund)** - The value of preferred stocks will fluctuate with changes in interest rates. Typically, a rise in interest rates causes a decline in the value of preferred stock. Preferred stocks are also subject to credit risk, which is the possibility that an issuer of preferred stock will fail to make its dividend payments. Preferred stock prices tend to move more slowly upwards than common stock prices.

**Foreign and Currency Exposure Risk (Income, Risk-on-Risk off, and Defensive Growth Funds)** - Foreign markets can be more volatile than the U.S. market due to increased risks of adverse issuer, political, regulatory, market, or economic developments and can perform differently from the U.S. market. The value of foreign securities is also affected by the value of the local currency relative to the U.S. dollar.

**MLP Risk (Income and Risk-on-Risk off Funds)** - Investments in MLPs involve risks different from those of investing in common stock including risks related to limited control and limited rights to vote on matters affecting the MLP, cash flow risks, dilution risks and risks related to the general partner's limited call right. MLPs are considered interest-rate sensitive investments. During periods of interest rate volatility, these investments may not provide attractive returns. Many MLPs are focused on energy-related business and are subject to energy sector risks, such as decline in the price of petroleum.

**Real Estate Risk (Income and Risk-on-Risk off Funds)** - Because of its investment in REITs, the Fund is subject to the risks of the real estate market as a whole, such as taxation, regulations and economic and political factors that negatively impact the real estate market and the direct ownership of real estate.



Liquidity Risk (Risk-on-Risk off Fund) - Liquidity risk exists when particular investments of the Fund would be difficult to purchase or sell, possibly preventing the Fund from selling such illiquid securities at an advantageous time or price, or possibly requiring a Fund to dispose of other investments at unfavorable times or prices in order to satisfy its obligations.

Commodity Related Risk (Risk-on-Risk off Fund) - The Fund's exposure to the commodities markets may subject the Fund to greater volatility than investments in traditional securities due to changes in interest rates, or sectors affecting a specific industry or commodity, such as drought, floods, weather, livestock disease, embargoes, tariffs and international economic, political and regulatory developments.

Buyback Strategy Risk (Large Cap Share Buyback Fund) - The announcement of a share buyback and other selection criteria used in selecting portfolio securities may not be accurate predictors of future share performance. The Fund's returns will be adversely affected if the Advisor selects stocks that subsequently decline in value.

Non-diversification Risk (Large Cap Share Buyback Fund) - Because a relatively high percentage of a non-diversified Fund's assets may be invested in the securities of a limited number of companies that could be in the same or related economic sectors, the Fund's portfolio may be more susceptible to any single economic, technological, or regulatory occurrence than the portfolio of a diversified fund.

## **Item 9 - Disciplinary Information**

None

## **Item 10 - Other Financial Industry Activities or Affiliations**

As of the date of this brochure, DSSWM is a subsidiary of DSS Securities Inc. and is affiliated with Document Security Systems, Inc. Both companies have affiliates or common ownership with companies involved in the brokerage and investment management industries.:

Shares of DSS-AmericaFirst mutual funds are currently offered on a continuous basis through:

Arbor Court Capital, LLC  
8000 Town Center Drive, Suite 400  
Broadview Heights, OH 44147

The Funds have no obligation to deal with any broker or dealer in the execution of its transactions.

DSSWM does not recommend or select other investment advisers for our clients and are not compensated for such activities.

## **Item 11 - Code of Ethics, Participation, or Interest in Client Transactions and Personal Trading**

We have adopted a Code of Ethics (the "Code") describing the standards of business conduct we expect our supervised persons to follow. The Code describes certain personal securities transaction reporting requirements with which certain, if not all, our employees, and supervised persons, must comply. Investment adviser representatives, employees, portfolio managers and/or other employees or supervised persons may own the same securities recommended to you. In many cases, these securities will be shares of mutual funds, ETFs,

stocks, or bonds that are actively traded on a national securities exchange and/or traded at such a high volume and will not affect transactions for our clients. Neither our firm nor any of our employees or supervised persons are permitted to benefit, directly or indirectly, from transactions made in your account.

We review the Code annually and update it when necessary. You may request a complete copy of our Code of Ethics by contacting us at (914) 420-1249.

## **Item 12 - Brokerage Practices**

Among the factors we consider in selecting or recommending the use of a broker-dealer or custodian are:

- Combination of transaction execution services and asset custody services
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payments, etc.)
- Breadth of available investment products
- Availability of investment research and tools to assist us in making investment decisions
- Competitiveness of the price of the services, including commission charges and other fees
- Reputation, financial strength, and stability

For the DSS-AmericaFirst funds, DSSWM currently utilizes Gar Wood Securities to execute and process transactions in stocks and TradeWeb Direct or Neovest to execute and process transactions in bonds and other fixed-income securities. DSSWM has chosen these broker-dealer relationships because of their industry reputation, market presence, and the quality and cost of their execution services.

DSSWM may develop a soft-dollar arrangement with certain broker dealers. However, we are not compensated for referrals, nor would such firms provide referrals to us.

## **Item 13 - Review of Accounts**

The Advisor regularly will review the positions held by the funds and manage the funds in accordance with each fund's stated investment objective.

## **Item 14 - Client Referrals and Other Compensation**

DSSWM does not currently compensate others for client referrals, nor are we compensated for providing referrals.

## **Item 15 - Custody**

DSSWM does not custody any customer assets. DSS-AmericaFirst Funds utilizes Fifth Third Bank as custodian for the mutual funds.

## **Item 16 - Investment Discretion**

DSSWM accepts discretionary authority only through an investment advisory agreement.

## **Item 17 - Voting Client Securities**

DSSWM will vote proxies on behalf of all clients.

DSSWM has adopted the following policies and procedures for proxy voting regarding portfolio companies in the DSSWM funds. Generally, DSSWM will vote based upon the portfolio company management's recommendation.

The key objectives of these policies and procedures recognize that a company's management is entrusted with the day to- day operations and long-term strategic planning of the company, subject to the oversight of the company's board of directors. While "ordinary business matters" are primarily the responsibility of management and should be approved solely by the corporation's board of directors, these objectives also recognize that the company's shareholders must have final say over how management and directors are performing, and how shareholders' rights and ownership interests are handled, especially when matters could have substantial economic implications to the shareholders.

Therefore, we strongly consider the following matters in exercising our proxy voting responsibilities as a fiduciary for our clients:

1. *Accountability* – Each company should have effective means in place to hold those entrusted with running a company's business accountable for their actions. Management of a company should be accountable to its board of directors and the board should be accountable to shareholders.
2. *Alignment of Management and Shareholder Interests* – Each company should endeavor to align the interest of management and the board of directors with the interest of the company's shareholders. For example, we generally believe that compensation should be designed to reward management for doing a good job of creating value for the shareholders of the company.
3. *Transparency* – Promotion of timely disclosure of important information about a company's business operations and financial performance enables investors to evaluate the performance of a company and to make informed decisions about the purchase and sale of a company's securities.

No one set of proxy voting policies can anticipate all situations that may arise. In some cases, we may seek outside guidance on how a proxy proposal may impact the financial prospects of a company and vote accordingly.

We believe that we invest in companies with strong management. Therefore, we will tend to vote proxies consistent with management's recommendations. However, we will vote contrary to management's recommendations if we believe those recommendations are not consistent with increasing shareholder value.

A copy of our complete Proxy Voting Policies and Procedures is available to our clients by calling 877-217-8363. We will send a copy of these Proxy Voting Policies and Procedures within five business days of receipt of a request, by first-class mail or other means designed to ensure equally prompt delivery.

We will also provide each client, without charge, upon request, information regarding the proxy votes cast by us regarding the client's securities.

## **Item 18 - Financial Information**

DSSWM does not charge or solicit pre-payment of \$1,200 in fees per client six or more months in advance. DSSWM has never been the subject of a bankruptcy petition.

## **Item 19 - Privacy Policy & Notification**

DSS Wealth Management and our affiliated companies are committed to maintaining the trust and confidence of our customers. DSSWM collects information that helps serve your financial needs, fulfill legal and regulatory requirements, and offer new products or services to meet your specific needs. The following Privacy Policy Notice describes what ‘nonpublic personal information’ we collect, what we do with it, and most importantly, how we protect it.

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### **Information Collected**

Information is gathered from a number of sources that may include the following:

- Information provided by you on account applications and other standard forms. This information includes, but is not limited to, your name, address, telephone number, Social Security Number, date of birth, annual income, employment status, and citizenship.
- Information about your DSSWM transactions, including information obtained through those companies that collaborate closely with us to provide you with diverse financial products and services. This information may include account balances, trading activity, loan amount, and payment history.
- Medical information, if relevant to your product or service, may also be obtained through third-party reports.
- Information we receive from consumer reporting agencies.
- Information obtained when verifying the information, you provide on applications or other forms (such as from current and past employers or other institutions where you conduct financial transactions).

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### **Parties to Whom We May Disclose Information**

We do not share customer information with outside companies for the purpose of selling their products and services to you.

Any information that we, or our affiliates, obtain from you is used only to help you acquire the investment, advisory, or insurance products that you desire from the companies you choose through our representatives. The personal nonpublic information obtained in this process will only be provided to nonaffiliated companies who have custody of your assets, prepare statements and transaction confirmations for your account, or provide credit reporting information.

In certain instances, DSSWM will disclose nonpublic personal information when permitted or required by law.

Parties that may receive this information include government/regulatory organizations such as the Federal Bureau of Investigation (FBI), Internal Revenue Service (IRS), and the Financial Industry Regulatory Authority (FINRA) and to other parties under court order or subpoena. We are also permitted to make disclosures to third parties per your request, direction, or authorization.

Medical/Non-Medical information may be provided to insurance companies and agencies to underwrite or shop policies for reduced policy costs. This information is only released with your permission.

We transfer information about you if DSSWM is acquired by or merged with another company. In this event, DSSWM will notify you before information about you is transferred and becomes subject to a different privacy policy.

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### **Opting Out of Third-Party Disclosures**

If you do not want us to share your information (other than as prescribed by law) with any nonaffiliated third parties, including the registered representative servicing your account when he or she leaves us to join another firm, you may contact the Compliance Department in writing at:

DSS Wealth Management, Inc.  
275 Wiregrass Parkway  
West Henrietta, NY 14586

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### **Confidentiality & Security**

We maintain internal standards and procedures to protect your information and prevent its dissemination to unaffiliated individuals and entities. We restrict access to nonpublic personal information about you to those employees, registered representatives or agents, and other parties who must use that information to provide products and services to you. We have physical, electronic, and procedural safeguards in compliance with applicable laws and regulations to guard your nonpublic personal information.

This Privacy Policy Notice applies to consumers who are customers of DSSWM and our affiliates.

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### **Changes to This Privacy Policy Notice**

DSSWM may update this policy. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary mailing address on file for your account(s) or by placing a prominent notice on our website.

We reserve the right to send you certain communications relating to your DSSWM service, such as service announcements, administrative messages, and Newsletters, which are considered part of your DSSWM account(s), without offering you the opportunity to opt-out of receiving them.

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**Contact Information**

If you have any questions after reading this Privacy Policy Notice, please contact us at:

DSS Wealth Management, Inc.  
275 Wiregrass Parkway  
West Henrietta, NY 14586  
(585) 325-3610