

This Supplemental Notice for California Consumers (“Supplemental Notice”) provides information required under the California Consumer Privacy Act (*Cal. Civ. Code §1798.100 et seq.*), as amended (“CCPA”). It explains how Forum Financial Management, LP (“Forum”) collects, uses, retains, and discloses personal information and describes certain rights regarding that personal information that California residents’ have under the CCPA. Any terms defined in the CCPA have the same meaning when used in this Supplemental Notice.

This Supplemental Notice applies only to information collected about California residents and is parallel in scope to our [Privacy Policy](#). This Supplemental Notice, including the rights described below, may not apply to all data, such as:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, such as personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (“FCRA”), the Gramm-Leach-Bliley Act (“GLBA”), or California Financial Information Privacy Act (“FIPA”), and the Driver’s Privacy Protection Act of 1994.

Definitions Specific to this Notice

The CCPA includes definitions for terms specific to this Supplemental Notice that do not apply to Forum’s [Privacy Policy](#) generally, including the following terms:

- “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. In this Supplemental Notice, we use the below “Categories of Personal Information” to describe the Personal Information we collect, use, and share about consumers.
- “Sale” or “sell” means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s Personal Information by the business to another business or a Third Party for monetary or other valuable consideration.
- “Service Provider” means certain for-profit legal entities that process information on behalf of us and to which we disclose your Personal Information for a defined business purpose pursuant to a written contract that prohibits the Service Provider from retaining, using, or disclosing your Personal Information for any purpose other than for the specific purpose of performing the services specified in the contract.
- “Third Party” means another business, other than a Service Provider, that collects your Personal Information.

Categories of Personal Information Collected

Please be aware that Forum collects relatively limited amounts of consumer Personal Information subject to all of the rights and provisions under the CCPA because the Personal Information we obtain is largely exempted from CCPA as personal financial data subject to GLBA or FCRA. This Supplemental Notice applies to the limited Personal Information that we collect directly from consumers or about consumers that is not covered under these exemptions.

We have collected the following Categories of Personal Information in the past 12 months:

- *Financial Information* – Financial information, including bank account number, routing information, credit or debit card number, payment amounts, or other financial information.
- *Identifiers* – Identifiers and contact information, including full name, alias, postal address, telephone number, email address, date of birth, account name, social security number, driver’s license number, passport number, unique personal identifier, IP address, online identifier, device or mobile advertising ID, service request ID number, or other similar identifiers.
- *Network Activity Data* – Internet activity information, such as browsing history, search history, cookie data, referring/exiting URL, clickstream data, time spent on a webpage or advertisement, or other information regarding an individual’s interaction with an internet website, application, email, or advertisement.
- *Professional Information* – Professional information, including employment history, job title, salary, or other professional and employment-related information.

- *Protected Characteristics* – Characteristics of protected classifications under state or federal law, such as race, gender, physical or mental disability, age (40 years or older), citizenship, sexual orientation, veteran or military status, genetic information (including familial genetic information), and religion.
- *Written Signature* – Written signature, such as a signature on an application, consent form, or program enrollment form.

Categories of Sources

We have collected the Categories of Personal Information identified above from the following categories of sources:

- Directly from consumers
- Consumer reporting agencies
- Advertising networks
- Internet service providers
- Broker-dealers (Custodians)
- Social networks
- Directly and indirectly from activity on our websites
- Data analytics providers

Purposes for Collecting Personal Information

We collect the Personal Information identified above for the following purposes:

- To provide financial services to you, such as processing and fulfilling financial transactions.
- To contact you to discuss the services you receive from us or to respond to any questions or concerns you have raised.
- To provide, support, personalize, and develop our websites and services.
- To create, maintain, customize, and secure your account with us.
- To verify your identity for fraud, crime prevention, or anti-money laundering activities, and other compliance checks and controls.
- As necessary or appropriate to protect the rights, property, or safety of us, our clients, or others.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our websites, products and services, databases and other technology assets, and business.
- To respond to valid law enforcement, legal, or regulatory requests and as required by applicable law, court order, or governmental regulations.
- For marketing purposes.
- For testing, research, analysis, and product development, including to develop and improve our websites, products, and services.

Disclosure of Personal Information

We disclosed for a business purpose the following Categories of Personal Information in the past 12 months to the categories of Third Parties identified:

- *Financial Information* – Third-party technology providers and Custodians
- *Identifiers* – Third-party technology providers and Custodians
- *Network Activity Data* – Third-party technology providers
- *Professional Information* – Third-party technology providers
- *Protected Characteristics* – Third-party technology providers and Custodians
- *Written Signature* – Third-party technology providers and Custodians

We do not and will not sell your Personal Information to Third Parties.

Your Rights

If you are a California resident, you have the following rights under the CCPA with respect to your Personal Information:

- *Right to Notice* – Before or at the time we collect Personal Information from you, you have the right to receive notice of the Personal Information to be collected and the purposes for which we use it.
- *Right to Know* – You also have the right to request that we disclose to you the Categories of Personal Information we have collected about you in the preceding 12 months, along with the categories of sources from which the personal information was collected, the purpose for collecting or selling the personal information, the categories of Third Parties with whom we shared the personal information, and the categories of Third Parties with whom we sold the personal information. You may make such a request up to twice in a 12-month span.
- *Right of Access* – You have the right to request that we disclose or provide you with access to the specific pieces of Personal Information we have collected about you in the preceding 12 months.

- *Right to Deletion* – You have the right to request that we delete the Personal Information we collect from you. However, in certain situations we are not required to delete your Personal Information, such as when the information is necessary in order to complete the transaction for which the Personal Information was collected, to provide a good or service requested by you, to comply with a legal obligation, to engage in research, to secure our websites or other online services, or to otherwise use your Personal Information internally in a lawful manner that is compatible with the context in which you provided the information.
- *Right to Opt-Out of the Sale of Personal Information* – We do not and will not sell your Personal Information to Third Parties.
- *Right to Correct* – You have the right to request that we correct inaccurate personal information.
- *Right to Limit Use and Disclosure of Sensitive Personal Information* – We only use your sensitive personal information for limited purposes, such as providing the requested financial services to you.

You can exercise your rights by calling (877) 873-8520 or by emailing compliance@forumfinancial.com. Please note that there are circumstances in which we may not be able to comply with your request pursuant to the CCPA, including when we cannot verify your request and/or when there is a conflict with our own obligations to comply with other legal or regulatory requirements. We will notify you following submission of your request if this is the case.

Verification Process

We value the security and confidentiality of your Personal Information. Therefore, if you exercise the rights described above, we must first verify your identify to make sure that you are the person about whom we have collected Personal Information. We will verify each request by asking that you follow our current procedures for verifying client identity such as providing your Forum account password. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you if you exercise any of the rights provided by the CCPA set forth in this Supplemental Notice. Please note that, as permitted by the CCPA, there are circumstances where we may deny a legitimate request, as well as charge a fee for excessive or repetitive consumer requests.

Direct Marketing Disclosure

California Civil Code Section § 1798.83 permits California residents to annually request certain information regarding our disclosure of Personal Information to other entities for their direct marketing purposes in the preceding calendar year. Forum does not distribute your Personal Information to other entities for their own direct marketing purposes.

Contact Us

If you would like additional information regarding our Supplemental Notice, please call us at (877) 873-8520 or email us at compliance@forumfinancial.com.

Changes to Our Supplemental Notice

Forum reserves the right to amend this Supplemental Notice at our discretion and at any time. When we make material changes to this Supplemental Notice, we will notify you by posting an updated Supplemental Notice on our website with a new “Last Updated” date.