



Privacy Notice

At Ares Financial Consulting (“AresFC”), we are committed to protecting your privacy. Please read on for more details about our privacy policies.

Your Privacy

AresFC requires that you provide current and accurate financial and personal information. We will protect the information you have provided in a manner that is safe, secure and professional. AresFC and all of their employees are committed to protecting your privacy and to safeguarding that information.

We recognize the importance of protecting our clients’ privacy. We have policies to maintain the confidentiality and security of your non-public personal information. The following is designed to help you understand what information we collect from you and how we use that information to serve your account.

Privacy Policy Notice

Your relationship with AresFC is based on trust and confidence. To fulfill our responsibilities to you, AresFC requires that you provide current and accurate financial and personal information. You deserve to expect that AresFC will protect the information you have provided in a manner that is reasonably safe, secure and professional. AresFC and its supervised persons are committed to protecting your privacy and to safeguarding that information.

Categories of Information We May Collect

In the normal course of business, we may collect the following types of information:

- Information you provide in the subscription documents and other applications and forms (including name, address, social security number, date of birth, income and other financial-related information);
- Checklists, written notations and other client data you provide for evaluation, registration, licensing or related services; and
- Data about your transactions with us (such as the types of investments you have made and your account status).

How We Use Your Information That We Collect

AresFC is the controller of the information collected from you. We have appointed a data protection director (DPD) who is responsible for overseeing questions in relation to the handling of your personal information. If you have any questions or concerns or requests concerning the privacy of the information that you provide, please contact our DPD at the address and/or phone number listed on the last page of this Privacy Notice.

Any and all non-public personal information that we receive with respect to our clients who are natural persons is not shared with non-affiliated third parties which are not service providers to us without prior notice to, and consent of, such clients, unless:



- When necessary to complete a transaction in a client account, such as with the account custodians;
- When required to maintain or service a client account;
- To resolve client disputes or inquiries;
- With persons acting in a legal fiduciary or representative capacity on behalf of the client;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- In connection with a sale or merger of AresFC's business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- To comply with federal, state or local laws, rules and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- In any circumstances with the client's instruction or consent; or
- Pursuant to any other exceptions enumerated in the California Information Privacy Act.

Additionally, we may disclose such non-public personal information as required by law (such as to respond to a subpoena) or to satisfy a request from a regulator and/or to prevent fraud. Without limiting the foregoing, we may disclose nonpublic personal information about you to governmental entities and others in connection with meeting our obligations to prevent money laundering including, without limitation, the disclosure that may be required by the Uniting and Strengthening America Act by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA PATRIOT) Act of 2001 and the regulations promulgated thereunder.

In addition, if we choose to dispose of our clients' nonpublic personal information that we are not legally bound to maintain, we will do so in a manner that reasonably protects such information from unauthorized access. The same privacy policy also applies to former clients who are natural persons.

Confidentiality, Security and Safeguarding Client Documents

We have physical, electronic and procedural security safeguards to protect and secure the information we collect. We restrict access to nonpublic personal information about our clients to those employees and agents who need to know that information to provide products and services to our clients. We maintain physical, electronic and procedural safeguards to protect our clients' nonpublic personal information.

During regular business hours, access to client records is monitored so that only those with approved entitlements may access the files. During hours in which the company is not in operation, the client records will be secured. No individual who is not so authorized shall obtain or seek to obtain personal and financial client information. No individual with authorization to access personal and financial client information shall share that information in any manner without the specific consent of a firm principal. Failure to observe AresFC's procedures regarding client and consumer privacy will result in disciplinary action, and may lead to termination.

We respect and value that you have entrusted us with your private personal and financial information, and we will work diligently to maintain that trust. We are committed to preserving that trust by respecting your privacy.



Updating Your Personal Information and Privacy Preferences

You have the right to access and correct or change any personal information that you provide to us at any time. You may do so by contacting your IAR or our DPD, or by sending us an email or letter, address below. Any change to the information that you have provided may affect the recommendations we make to you, the management of your account or the delivery of other services and information to you. We will respond to you request within thirty days.

Information Security

AresFC maintains an information security program to minimize the risk that your personal and confidential information may be breached.

Data Retention

AresFC will retain your account information for as long as your account is active, your information is needed to provide you services, or as required to fulfill AresFC' legal obligations, plus a required 3-year retention period.

Opt-Out Provisions

It is not a policy of Ares Financial Consulting LLC to share non-public personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Unless you ask us not to, we may contact you via email in the future to tell you about service updates or changes to this privacy policy. If you have any questions regarding the safeguarding of your non-public personal and financial information, please contact our Data Protection Director / Privacy Officer below.

Ares Financial Consulting, LLC
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