

Schrum Private Wealth Management, LLC (“**Schrum PW**”, “**we**”, “**our**”, “**us**”, or “**our firm**”) is committed to maintaining the confidentiality and security of the personal information we collect from our prospective, current, and former clients (“**client**” or “**you**”). The proper handling of personal information is one of our highest priorities and we feel it is important for you to understand how we protect your privacy. Please review this Privacy Policy Notice (“**Notice**”) to understand how we use your personal information and the measures taken to safeguard that information.

Collection & Retention of Your Personal Information

We collect and retain information that is necessary for us to provide our services and administer business as requested by you. We may collect the following nonpublic personal information (“**personal information**”):

1. Information we receive from you on applications, agreements, or other forms when you open an account or register for one of our services—including, but not limited to, your name, legal and mailing address, tax identification number, date of birth, phone number(s), email address, and financial information such as income, net worth, annual expenses, etc.;
2. Information about your transactions—including, but not limited to, account numbers, account balance, transaction history, parties to transactions, cost basis information, and similar account records; and
3. Information we receive from a consumer reporting agency to meet our customer identification regulatory obligations.

Use of Your Personal Information

We use your personal information to administer day-to-day business, including, but not limited to:

1. Verifying your identity;
2. Fulfilling legal and regulatory obligations;
3. Establishing and maintaining your accounts;
4. Providing financial advice;
5. Purchasing and selling of securities in your accounts;
6. Fulfilling asset movement requests; and
7. Informing you about other financial services or educational pieces that may be of interest to you, etc.

Disclosure of Your Personal Information

We will only disclose your personal information when it is necessary to implement our services, when required by law, or upon your written instruction. **IT IS OUR POLICY THAT WE DO NOT SELL YOUR PERSONAL INFORMATION TO ANYONE.**

Sharing Your Personal Information

We may share personal information with nonaffiliated outside companies and other third parties in limited circumstances:

1. To companies that perform services for us or function on our behalf, such as a custody/clearing firm, money manager, or insurance company;
2. To your attorney, trustee, or anyone else who legally represents you in a fiduciary capacity;
3. To our attorneys, accountants, or auditors; and
4. To government entities, regulatory authorities, or other third parties in response to subpoenas or other legal processes as required by law or to comply with regulatory exams or inquiries.

When we share your personal information with outside companies or third parties, we require them to safeguard your personal information and only use it for the agreed upon purpose.

Confidentiality & Security of Personal Information

We restrict access to personal information to those individuals who need to know that information to provide products or services to you and perform their respective duties. Each of our employees is responsible for maintaining the confidentiality of personal information. We require all our employees to agree in writing to protect the confidentiality of personal information and to use it only for business purposes.

We maintain physical, electronic, and procedural safeguards that comply with federal standards to protect your personal information.

We recognize that email can be the preferred mode of communication between you and our firm. When you request us to email you documents or information about your accounts or services that include personal information, for security purposes, it is our policy to first direct you to the appropriate secure online portal that contains the document or information you are looking for. If accessing the online portal is unsuccessful or not an option, we will encrypt our email message to you to protect your personal information from being illegally accessed.

Because we contract with nonaffiliated outside companies/third parties for business purposes and support services, i.e., technology vendors, we carefully review and perform due diligence on their policies and procedures surrounding the security and protection of nonpublic personal information. When selecting or contracting a third party, we require them to agree to adhere to the same privacy standards, laws, and regulations that apply to us.

Former Clients

If our services are terminated and you are no longer a client, we will continue to adhere to the privacy policies and practices as described in this Notice, or as amended (see 'Changes to This Privacy Policy for more information).

Changes to This Privacy Policy

If there are material changes in the way we use or share personal information, we will update our privacy policy accordingly and send you an updated Notice. Our firm's most up to date privacy policy can be found on our website, www.schrumpw.com.

Annual Notices

We provide our Privacy Policy Notice to each client at least once per year, as federal and state laws require. We reserve the right to modify this policy at any time. If you have additional questions regarding our firm's privacy policy please contact our Chief Compliance Officer, Feisal Malik via email at compliance@schrumpw.com, or phone at (703) 657-6075.