FORTITUDE
FAMILY OFFICE

Privacy Notice

At Fortitude Family Office, safeguarding the privacy of our clients is a cornerstone of our fiduciary responsibility. We recognize the sensitive nature of the personal and financial information you entrust to us, and we are committed to protecting it with the highest standards of confidentiality, security, and regulatory compliance.

This notice explains:

- The categories of information we collect
- How we use and share that information
- Your rights and choices regarding certain types of sharing
- The safeguards and procedures we maintain to protect your information

---

1. Information We Collect and Why

We collect only the information necessary to deliver services, comply with regulatory obligations, and support your financial objectives. Information may include:

- **Personal identifiers** such as name, address, date of birth, Social Security number, and contact details.
- **Financial information** such as income, assets, investment holdings, and account activity.
- **Supporting documentation** including estate plans, tax filings, and other materials you authorize us to receive.
- **Account access information** such as usernames, passwords, security questions, and other authentication credentials for accounts you hold at banks, custodians, and other financial institutions, where you authorize us to use them to provide services on your behalf.

We obtain this information directly from you, from forms and applications, or through authorized third parties (such as custodians or brokers). Account access information is obtained only from you or at your direction, and only where you have authorized us to hold and use it.

Children’s Privacy

Our services are designed for and directed to adults. Our website, client portal, and digital intake forms are intended for use by adults seeking financial advisory, wealth management, tax, and related professional services, and we do not knowingly collect personal information online from children under the age of 13, as defined by the Children's Online Privacy Protection Act ("COPPA").

In the course of providing advisory, estate, tax, and family office services, we may receive information about minor children — such as a name, date of birth, or beneficiary designation — from an adult client, an employee, or an authorized third party acting at their direction. Information received in this manner is not collected from the child and is treated as client or employee information under this notice. It is subject to the same collection, use, sharing, and safeguarding practices described in the sections above, and is used only to deliver the services you have engaged us to provide or to meet a legal or regulatory obligation.

FORTITUDE
FAMILY OFFICE

If we become aware that we have inadvertently collected personal information online from a child under 13, we will take prompt steps to delete that information from our records. If you believe that a child under 13 has provided personal information to Fortitude Family Office through any of our digital properties, please contact us using the information in the Contact Us section below.

---

2. How We Use and Share Information

We use your information to provide financial, estate, and investment advisory services; to comply with legal and regulatory requirements; and to operate efficiently as a family office.

Sharing for Business Purposes

We may share information with trusted parties in order to carry out everyday business functions, such as:

- **Custodians and brokers** – to open, maintain, and service investment accounts.
- **Auditors, accountants, and tax professionals** – to support reporting and tax compliance.
- **Attorneys and estate planners** – to implement legal and financial planning strategies.
- **Specialized consultants and technology providers** – to host, secure, and process information on our behalf, including the secure storage of account access information. Also, to strengthen operations, cybersecurity, and compliance. These providers are contractually obligated to protect your information and to use it only for the purposes we specify.

Shared data may include personal identifiers, financial information, and relevant documentation.

What We Do Not Do

- We do not sell your personal information.
- We do not share mobile numbers or SMS opt-in data for marketing or promotional purposes.

---

3. Your Privacy Choices

Certain types of information sharing are required by law and cannot be limited, such as disclosures to regulators, custodians, or other parties necessary to deliver your advisory services.

Fortitude Family Office does not share client personal information with unaffiliated third parties for marketing purposes, and does not use client information for any promotional or marketing activity beyond the delivery of advisory, financial planning, and family office services described in this notice. Accordingly, there is no marketing-related sharing for which an opt-out election is applicable.

Clients who are residents of California or Texas may request access to, correction of, deletion of, or a portable copy of their personal information. We will acknowledge a request within ten business days and respond within 45 days, which may be extended by an additional 45 days where reasonably necessary, with notice to you. Requests may be submitted using the contact methods above.

If you have questions about how your information is used or shared, or wish to request that we limit any sharing not required by law or necessary to service your accounts, you may contact us at any time by:

- Calling us at **(602) 834-0089**
- Emailing **info@fortitudefo.com**
- Mailing a written request to **7500 N Dobson Rd, Suite 151, Scottsdale, AZ 85256**

We will respond to all inquiries within **30 days**.

---

4. Safeguards and Security

Protecting client information is integral to how we operate. We maintain:

- **Access controls** that limit data access to employees with a legitimate business need.
- **Physical and electronic safeguards** including secure networks, monitored systems, and encryption of data in transit and at rest where supported by the systems and institutions involved.
- **Ongoing training** for employees on privacy and cybersecurity practices.
- **Heightened controls** for account access information, including storage in an encrypted, firm-administered password manager.

---

5. Incident Response and Notifications

Fortitude Family Office has an incident response framework designed to identify, investigate, and remediate unauthorized access or misuse of client information.

- If an incident involves unauthorized access to or use of your sensitive personal information, or we determine such access or use is reasonably likely to have occurred, we will notify you as soon as practicable and no later than 30 days after becoming aware of the incident, or sooner where required by applicable law.
- We maintain written records of all incidents and corrective actions taken.
- Our compliance team reviews incidents to strengthen safeguards and prevent recurrence.

---

6. Recordkeeping and Compliance

We document and retain:

- Copies of privacy notices delivered to clients
- Opt-out elections and related correspondence
- Incident response reports and remediation efforts
- Internal procedures related to safeguarding personal data

Records are maintained in line with SEC regulations and Fortitude Family Office compliance policies.

FORTITUDE
FAMILY OFFICE

7. Changes to This Policy

Fortitude Family Office will update its policy and procedures when necessary to ensure that your privacy is maintained and that Fortitude Family Office conducts business in a way that fulfills our commitment to you. If Fortitude Family Office makes any material changes in its privacy policy, we will make that information available to clients through our website and/or other communications.

---

8. Contact Us

Questions or concerns regarding this policy may be directed to our Chief Compliance Officer:

Fortitude Family Office
Phone: **(602) 834-0089**
Email: **info@fortitudefo.com**
Address: **7500 N Dobson Rd, Suite 151, Scottsdale, AZ 85256**