

COPE CONNELLY

Privacy Policy 2026

As a registered investment adviser, Cope Connelly is required by law to inform clients about our privacy practices. We are also bound by professional standards of confidentiality that exceed those required by law. Federal law gives you the right to limit some — but not all — sharing of your personal information and requires us to explain how we collect, share, and protect it. This notice reflects our updated practices under the SEC's 2024 amendments to Regulation S-P, effective for our firm in 2026.

INFORMATION WE COLLECT

We collect nonpublic personal information (NPI) about you that is provided to us directly or obtained with your authorization. This may include your Social Security Number, date of birth, banking information, financial account numbers and balances, sources of income, and other identifying financial data. We may continue to maintain certain information after you are no longer our client, as required by law or our recordkeeping obligations.

HOW WE SHARE YOUR INFORMATION

All investment advisers may need to share client information in the ordinary course of business. We may share your information for the following purposes:

- Everyday business operations — processing transactions, maintaining your accounts, responding to court orders and legal investigations, or reporting to credit bureaus;
- Marketing our own products and services to you;
- Joint marketing arrangements with other financial companies;
- Sharing with our affiliates for their everyday business purposes, including information about your transactions, experiences, and creditworthiness; or
- Sharing with non-affiliates who may market to you.

If you are a new client, we may begin sharing your information on the day you sign our agreement. You may contact us at any time to limit our sharing.

YOUR RIGHT TO LIMIT SHARING — OPT-OUT

Federal law gives you the right to limit certain sharing of your NPI. You may opt out of: sharing with our affiliates for creditworthiness purposes; and sharing with non-affiliates or affiliates who use your information for marketing. State laws may provide additional opt-out rights. **Please contact us immediately if you wish to exercise any opt-out right.**

PROTECTING YOUR INFORMATION

We maintain physical, electronic, and procedural safeguards that meet or exceed federal requirements to protect your NPI from unauthorized access, use, or disclosure. Access to client information is restricted to personnel who need it to deliver our services. All client data stored electronically is password-protected and firewall-secured.

DATA BREACH NOTIFICATION — AMENDED REG S-P (2024)

Under SEC Regulation S-P as amended in 2024, we are required to maintain a written Incident Response Program designed to detect, respond to, and recover from unauthorized access to your personal information. If a breach occurs that involves your sensitive personal information — such as your Social Security Number, account numbers, or login credentials — we are required to notify you **within 30 days** of becoming aware of the incident. That notification will describe what happened, what information was involved, and steps you can take to protect yourself.

We also require our third-party service providers who handle your data to notify us within 72 hours of discovering any breach affecting your information, and to maintain safeguards equivalent to our own.

DEFINITIONS

Affiliates — companies related to us by common ownership or control; may be financial or non-financial companies.

Non-affiliates — companies not related to us by common ownership or control; may be financial or non-financial companies.

Joint marketing — a formal agreement between non-affiliated financial companies that together market financial products or services to you.

Sensitive personal information (SPI) — a subset of NPI including Social Security Numbers, financial account credentials, and similar data whose unauthorized disclosure could result in identity theft or fraud. SPI is subject to the enhanced breach notification requirements described above.

Please call 301-259-5607 or email Greg Averyt at gaveryt@copeconnelly.com with any questions. Your privacy, our professional ethics, and the quality of our financial services are paramount to us.