

**PRIVACY POLICY NOTICE**

**FACTS**

**WHAT DOES RWM CAPITAL, LLC DO WITH YOUR PERSONAL INFORMATION?**

**Why?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

**What?**

The types of personal information we collect and share depends on the product or service you have with us. This information can include, but is not limited to: • Social Security number and income; • Assets and transaction history; and • Investment experience and risk tolerance.

When you are *no longer* our client, we continue to share your information as described in this notice.

**How?**

All financial companies need to share clients’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients’ personal information; the reasons RWM Capital, LLC chooses to share and whether you can limit this sharing.

Reasons we can share your personal information	Does RWM Capital, LLC?	Can you limit this sharing?
<b>For our everyday business purposes</b> – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	NO
<b>For our marketing purposes</b> – to offer our products and services to you	YES	YES
<b>For joint marketing with other financial companies</b>	NO	We do not share
<b>For our affiliates’ everyday business purposes</b> – information about your transactions and experiences	YES	YES
<b>For our affiliates’ everyday business purposes</b> – information about your creditworthiness	YES	YES
<b>For our affiliates to market to you</b>	YES	YES
<b>For non-affiliates to market to you</b>	NO	We do not share

**To limit our sharing**

**Please note:**

If you are a new client, we can begin sharing your information from the date we sent this notice. When you are no longer our client, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

**Questions?**

Call: 832-981-7000

**Who we are**

<b>Who is providing this notice?</b>	RWM Capital, LLC
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**What we do**

<b>How does RWM Capital, LLC protect my personal information?</b>	To protect your personal information from unauthorized access and use, we restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We also maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.
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<b>How does RWM Capital, LLC collect my personal information?</b>	We collect your personal information, for example, when you n open an account or give us contact information n enter into an investment adviser contract or give us your income information n tell us about your investment or retirement portfolio We also collect your personal information from other companies.
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<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only n sharing for affiliates' everyday business purposes—information about your creditworthiness n affiliates from using your information to market to you n sharing for non-affiliates to market to you</p> <p>State laws and individual companies may give you additional rights to limit sharing</p>
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**Definitions**

<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. n <b>Roberts Wealth Management, LLC – Used for Insurance Related business</b>
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<b>Non-affiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. n <b>NONE</b>
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<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. n <b>NONE</b>
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**Other important information**

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**FACTS****RWM CAPITAL, LLC Privacy Policy for  
SMS/MMS Marketing Campaign****Introduction**

At Roberts Wealth Management, your privacy is important to us. This Privacy Policy explains how we collect, use, and protect your personal information when you engage with our SMS/MMS marketing campaign. By opting into our services, you agree to the terms outlined in this policy. This Privacy Policy supplements our Terms & Conditions. By opting into our services, you agree to both this Privacy Policy and the Terms & Conditions outlined by Roberts Wealth Management.

**What We Collect**

We collect the following types of information when you opt into our SMS/MMS marketing service:

- **Personal Information:** Your phone number and, potentially, your name if provided.
- **Usage Data:** Information regarding how you interact with our messages, including the date and time of message receipt, responses, and opt-out actions.

**How We Use Your Information**

We use your information for the following purposes:

- **Communications:** To send you promotional messages, transactional alerts, polls, and other relevant content about our products and services.
- **Internal Analysis:** To improve the effectiveness of our marketing services by analyzing your interactions with our messages.
- **Compliance:** To meet legal obligations, resolve disputes, and enforce agreements.

**Sharing Your Information**

We may share your information in the following situations:

- **Service Providers:** We may share your information with third-party service providers who assist us in managing and executing our SMS/MMS marketing campaigns. These service providers are required to protect your data and maintain confidentiality.
- **Legal Requirements:** We may disclose your information if required by law or if necessary to protect our rights, property, or safety.

We only share SMS-related data with affiliates and service providers that adhere to SEC and FINRA communication compliance standards. No data is shared for non-affiliate marketing purposes.

**Data Retention**

We retain SMS communication logs for up to six (6) years to comply with SEC and FINRA recordkeeping regulations. These records are archived and monitored to ensure compliance with financial industry standards.

**Security**

We implement reasonable security measures to protect your personal information against unauthorized access, alteration, disclosure, or destruction. However, please note that no method of electronic transmission or storage is entirely secure.

**Your Rights**

As a user of our SMS/MMS service, you have the following rights:

- **Opt-Out:** You can stop receiving SMS/MMS messages at any time by replying "STOP" to any message you receive from us.
- **Access, Correction, and Deletion:** Depending on your location, you may have the right to access, correct, or delete your personal information.

To exercise any of these rights, please contact us directly. To request access, correction, or deletion of your personal data, please submit a written request via email at [info@robertswealth.com](mailto:info@robertswealth.com). We will respond within 10 business days, per regulatory requirements.

**Children's Privacy**

Our services are intended for individuals 18 years or older. We do not knowingly collect data from minors. If we discover a minor has opted in, we will promptly remove their information.

**Changes to This Privacy Policy**

We may update this Privacy Policy from time to time. Any changes will be posted on this page, and the "Last Updated" date will be revised accordingly. We encourage you to review this policy periodically to stay informed about how we protect your privacy.

**Contact Us**

If you have any questions regarding this Privacy Policy or wish to exercise your rights, please contact us at:  
Email: [info@robertswealth.com](mailto:info@robertswealth.com)  
Phone: Tx: 832-981-7000; Ms: 228-999-7000; Al: 251-581-9000; Fl: 850-805-7000

<b>FACTS</b>	<b>RWM CAPITAL, LLC SMS/MMS Terms and Conditions</b>
Terms of Acceptance	By opting into our SMS/MMS marketing campaign, you agree to be bound by these Terms and Conditions ("Terms"). If you do not agree to these Terms, please do not opt into our SMS/MMS messages.
Eligibility	You must be at least 18 years old, or the age of majority in your jurisdiction, to receive text messages from Roberts Wealth Management. You must have the legal right to enter into this agreement.
Enrollment	You can enroll in our SMS/MMS service by texting an opt-in keyword (e.g., "JOIN") to the SMS short code or long code provided by us. Your consent to receive text messages is not a condition of purchasing any property, goods, or services.
Third-Party Service Providers	Our SMS service providers must adhere to SEC and FINRA communication retention and supervision requirements, ensuring messages are archived and accessible for compliance purposes.
Frequency	You may receive recurring messages depending on your interaction and the promotions we run. The exact frequency will vary.
Content of Messages	Messages may include marketing promotions, transactional information, alerts, polls, and other content related to Roberts Wealth Management's products or services.
Cost	Standard message and data rates may apply according to your carrier. Check with your mobile service provider for details.
Opt-Out	You can opt out of receiving messages at any time by replying "STOP" to any message you receive. After opting out, you will receive a confirmation text, and you will no longer receive messages from us unless you opt back in. If you opt out, you might not receive important updates or promotions.
Support	For support or questions about our SMS/MMS service, reply "HELP" to any message, or contact us at <a href="mailto:info@robertswealth.com">info@robertswealth.com</a> or 832-981-7000.
Privacy	We respect your privacy. Your personal information will be handled according to our Privacy Policy, which can be found on our <a href="#">webpage</a> .
Changes to Terms	We reserve the right to modify these Terms at any time. We will notify you of any changes by posting the new Terms on our website or sending you a message. Your continued use of the service after changes indicates your acceptance of the new Terms.
Termination	We may terminate or suspend access to our SMS/MMS service immediately, without prior notice or liability, for any reason whatsoever, including without limitation if you breach these Terms.
Disclaimer of Warranty	The SMS/MMS service is provided on an "as is" and "as available" basis. We do not warrant that the service will be uninterrupted, timely, secure, or error-free.
Limitation of Liability	In no event shall Roberts Wealth Management be liable for any indirect, incidental, special, consequential, or punitive damages, or any loss of profits or revenues, whether incurred directly or indirectly, or any loss of data, use, goodwill, or other intangible losses.
Governing Law	These Terms shall be governed by and construed in accordance with the state and federal laws, without regard to its conflict of law provisions.
Supervisory & Archiving Compliance	SMS communications are subject to monitoring and archival review to comply with regulatory standards set by the SEC and FINRA. Employees are prohibited from using personal devices for business-related messaging unless the communication is archived through an approved compliance system. Failure to comply may result in disciplinary action.
Contact Information	For any questions about these Terms, please contact us at: Email: <a href="mailto:info@robertswealth.com">info@robertswealth.com</a> Phone: Tx: 832-981-7000; Ms: 228-999-7000; Al: 251-581-9000; Fl: 850-805-7000