

## NOTICE OF PRIVACY PRACTICES

January 2024

Synergy Financial Services Corporation, Inc., Synergy Asset Management, LLC,  
Synergy Mergers + Acquisitions, LLC, and Associated Companies

The Securities and Exchange Commission's rule, Regulation S-P, implements the privacy requirements of the financial modernization legislation entitled the Gramm-Leach-Bliley Act, which was signed into law on November 12, 1999. We would like this opportunity to share our privacy practices with you as a result of this rule.

- As part of our investment management business, we obtain certain “nonpublic personal financial information.” This information includes information we receive about you in connection with providing or obtaining a financial product or service (e.g., information provided to open an advisory relationship) and information about your transactions with others or us (e.g., information about account balances, securities positions, or financial products purchased).
- As part of our insurance business, we obtain certain “nonpublic personal financial information” about you. This information includes information we receive from you on applications or other forms, information about your transactions with us, our affiliates or others, and information we may receive from a consumer-reporting agency. We may also share other types of information with our affiliates, including insurance companies and insurance service providers.
- We restrict access to this information to authorized individuals who need to know this information to provide service for you.
- We maintain physical, electronic, and procedural safeguards that protect your information.
- We shred any document that we are disposing of if it contains your “nonpublic personal information”.
- We do not disclose this information about you or any former customers to anyone.
- Employees do not share this information outside the firm.

You do not need to call nor do anything as a result of this notice. It is meant to inform you of how we safeguard your nonpublic personal financial information. You may wish to file this notice with your investment papers.

We value our relationship with you and strive to earn your continued trust.

# FACTS

## WHAT DOES SYNERGY ASSET MANAGEMENT, LLC (SAM) 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 depend on the product or service you have with us. This information can include:

- Social Security number and financial information
- Investment holdings and investment experience
- Financial goals and financial history

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

### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons [FIRM] chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does SAM share?	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	No
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

### Questions?

Call (206) 386-5455 or email the service team at [ServiceTeam@synergy-am.com](mailto:ServiceTeam@synergy-am.com)

## Who we are

Who is providing this notice?

SYNERGY ASSET MANAGEMENT, LLC

## What we do

How does SAM protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We also restrict access to your personal information to those individuals who need to know the information to provide services and/or products to you.

How does SAM collect my personal information?

We collect your personal information, for example, when you

- Open an account or deposit funds.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

## Definitions

**Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Our affiliates include Synergy Financial Services, LLC and Synergy Mergers + Acquisitions, LLC

**Nonaffiliates**

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- Our nonaffiliated business partners include custodians, e.g., Charles Schwab, Inc. and TD Ameritrade.

**Joint marketing**

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

## Other important information

You may have privacy protections under applicable state laws, including those for California residents. To the extent the state laws apply, we will comply with them when we share information about you, and in some case may be limited by you.

### *California Residents:*

The California Information Privacy Act provides additional protections to control whether we share some of your personal information. In accordance with California law, we will not share information we collect about California residents with outside companies, except as permitted by law, such as with the consent of the customer or to service a customer's accounts.