



Privacy Policy: Protection of Your Personal Financial Information

Sanctuary Advisors, LLC

Who We Are

Sanctuary Advisors, LLC is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”). Through our Financial Advisors (who are associated persons of Sanctuary Securities, Inc. our affiliated FINRA member broker-dealer and may also be investment advisor representatives with Sanctuary Advisors, LLC, in states where such registration is required), we provide financial products and services to the general public.

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some, but not all information sharing. Federal law also requires us to describe how we collect information about you, under what circumstances we may disclose the information to others, and how we safeguard your information in our possession.

Please read this notice carefully to understand our privacy policies.

Why We Collect Information

We collect and use information about you in order to provide you with our financial products and services. For example, we use your information to determine the appropriateness of our investment recommendations and to process transactions for your account.

What Information We Collect

The information we collect may include personal financial information such as your name, address, social security number, assets, income, net worth, investment experience, risk

tolerance, investment objective, beneficiary designations, and other information derived from your account application.

How We Collect Information

We obtain most information directly from you when you establish an account or purchase financial products or services from us. For example, we may collect your personal information directly from you when you seek financial advice about your investments, direct us to buy or sell securities, provide employment information, or provide us with your government-issued ID. We may also obtain information about you from our Financial Advisors, and from third parties such as retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies, your former broker-dealer, or its registered representative, clearing firms, or others who have provided you with financial products or services.

Information We Disclose

We may disclose information about you, as described above, to our staff, affiliates, representatives, their affiliated businesses, nonaffiliated third parties who provide you with financial products and services, and our service providers, such as a mailing company. These nonaffiliated third parties may include retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies and agencies, other broker-dealers, and clearing firms. Our Privacy Policy is the same for current, as well as former clients. Also, if you close your account, in the process of transferring your investments we may share your information with the new broker-dealer or custodian that you or your Financial Advisor selects. We may disclose information such as your name, address, social security number, date of birth, transactional information, or other financial information when necessary for us to provide you with financial products and services or report on your account, or where disclosure is prescribed by law. For example, we report your tax-related information to federal and state governments, and we may disclose information during the course of an audit or to law enforcement or regulatory agencies. We do not disclose your information to nonaffiliated companies who intend to market their products to you. For example, we will not sell clients' names and addresses to a catalog or marketing company.

“Opting out” of Third-Party Disclosures

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

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 non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. Sanctuary may utilize common information systems or databases to which employees of our affiliates may have access that could contain your information. However, such information will not be disclosed by a Sanctuary affiliate except as permitted by law.

How We Protect Personal Information

To protect your personal information from unauthorized access and use, we use commercially reasonable technical and physical security measures that comply with applicable law. When we share information with third parties, we hold parties to commercially reasonable standards of privacy protection. We have policies designed to ensure only those persons who need your information to perform their job have access to it. In addition, we maintain physical, electronic, and procedural security measures that comply with applicable regulations to protect your information. We train our employees in the proper handling of personal information.

Other Applicable Laws

The practices described are in accordance with Federal Law. We also follow privacy requirements under applicable state law. If a state's privacy laws are more restrictive than those stated in this policy, we comply with those laws.

Some state laws grant additional privacy rights to their residents. If you live in an "opt-in" state, where we are required to obtain your affirmative consent to share your nonpublic personal information with nonaffiliated third parties who do not currently assist us in servicing your account or conducting our business, your financial professional is required to obtain your consent before they can take your information with him or her should they leave our firm.

California Residents: For California residents, we will not share your personal information with nonaffiliated third parties, except as required or permitted by law. In addition, for California residents, you are afforded certain rights regarding the nonpublic personal information that we collect from you, including the right to know what personal information we have collected from you, what it is being used for, whether it is being disclosed or sold to nonaffiliated third parties, to whom it is being disclosed or sold, and the right to request that we delete certain personal information that we have collected from you. Please see pages 2 and 3 of this notice for more information.

Nevada Resident: We are providing you this notice pursuant to Nevada law. If you prefer not to receive marketing calls from us, you may be placed on our Internal Do Not Call List by contacting your Financial Advisor.

Vermont Residents: Under Vermont law, we will not share information we collect about Vermont residents with companies outside of Sanctuary, unless the law allows. For example, we may share information with your consent, to service your accounts or under distribution agreements with other financial institutions with which we have joint distribution agreements. We will not share information about your creditworthiness outside of Sanctuary except with your consent, but we may share information about our

transactions or experiences with you in order to service your account with third parties (for example your Custodian) without your consent.

For Insurance Clients in AZ, CA, CT, GA, IL, ME, MA, MN, MT, NV, NJ, NC, OH, OR, and VA. “Personal information” means any individually identifiable information gathered in connection with an insurance transaction. We collect personal information about you from applications or other forms you complete, your business dealings with us and other companies, and consumer reporting agencies. We disclose your information in the following circumstances: as described on page 1 of this Privacy Notice; with your consent; to third parties where necessary to determine your eligibility for insurance benefits, process claims, detect fraud or nondisclosure; to insurance regulatory authorities; to law enforcement or other governmental authorities to protect our interests and to prevent fraud; to our service providers who process and maintain your account and coverages; and as otherwise permitted by law; The law allows us to share your financial information with our affiliates to market products or services to you. You cannot prevent these disclosures, except as stated in this Privacy Notice. We protect your nonpublic personal information. The only employees who have access to that information are those who must have it to provide products or services to you. You have the right to access, correct, amend, or delete personal information that we have recorded about you. In the event of an adverse underwriting decision, you have the right to submit a written request for the reason(s) for the adverse decision. To exercise these rights, please submit a written request to us at legal@sanctuarywealth.com.

Questions

If you have questions about our privacy policy, you may contact your Financial Advisor, or you may contact us at: Sanctuary Wealth, Attention: Legal Department, 250 West 96th Street, Suite 300, Indianapolis, Indiana 46260. You may also call us at (833) 608-5514 or contact us electronically at legal@sanctuarywealth.com.