

# Online Privacy Policy Guidance

## 1. Introduction

Lohr & Company distributes a variety of financial products and services to you through its network of independent registered representatives, investment adviser representatives, and insurance agents. We have always valued the trust our customers have placed in us and are committed to the responsible management, use, and protection of our customers' personal data. We are proud of our privacy and confidentiality practices, and we want you to know how we protect your data.

This Online Privacy Policy identifies the ways Lohr & Company and its affiliates collect, store, use, disclose, and protect your personal data. Personal data, also known as personal information, personally identifiable information (PII), or sensitive personal information (SPI), is any information that can identify a person.

You agree to the practices regarding your personal data outlined in this policy when you use Lohr & Company online services (<https://www.lohrandcompany.com>, [www.commonwealth.com](http://www.commonwealth.com), Client360°, Investor360°, Practice360°).

## 2. Data We Collect About You

We may collect data when you use or enroll in Lohr & Company's online services, including some types of personal data. Examples of personal data include your name, address, email address, telephone number, social security number, and internet protocol (IP) address and/or domain, as well as other data you may provide us related to a financial product or service; these include, but are not limited to, investment preferences, demographic information, or financial information. We may also receive your contact information from a third-party website regarding requests about financial products and services on that website. For Lohr & Company clients, we will ask you for contact information to provide you with secure online account access. We may collect and maintain information about your account, online account activity, online services, products requested, and usage of our website and applications.

## 3. Use/Sharing of Your Personal Data

We will use your personal data to provide information, products, or services you request in Lohr & Company's online services; to verify your identity when accessing these services; to compare information for accuracy and verify our records; or to detect and prevent fraud or other criminal activities. We may share some of your personal data with other entities that perform services for Lohr & Company and are authorized to use your personal data to support our business operations. We may also share some of your personal data as permitted or required by law or as authorized by you.

## 4. Storage/Protection of Your Personal Data

To protect the privacy and security of personal data, we have designed and maintain administrative, technical, physical, and operational safeguards. Given the open nature of the internet, however, your personal data may be transmitted without security measures over networks connecting you to Lohr & Company systems and may be accessed and used by parties other than those for whom the data is intended. To safeguard against unauthorized access, Lohr & Company employs secure network architectures, such as encryption techniques, firewall barriers, authentication protocols, and intrusion detection.

## 5. Cookies

A cookie is a text file that is stored by a web browser on a user's machine. Websites use cookies for authentication, storing website/information preferences, and other browsing information that can help the web browser while accessing web servers. Lohr & Company uses cookies and similar technologies to track usage of the website and to address security issues. We may also use cookies to store your preferences relating to the use of our website. If you do not want to allow our website to place a cookie on your computer, you can change your browser's settings to deny cookies; however, this may affect your experience with certain features of our website. Our websites do not respond differently when accessed by a browser that uses a do-not-track signal or similar mechanism.

## **6. Social Media**

We provide additional information about Lohr & Company products and services on our social media sites such as Facebook, LinkedIn, and Twitter. Information shared on these social media sites is accessible to all participants; therefore, you should never post any personal data.

## **7. Personal Data on Children**

We respect the privacy of children; therefore, we do not invite children to visit Lohr & Company online services nor do we intentionally collect or use personal data from children under the age of 13. For more information on the Children's Online Privacy Protection Act (COPPA), please visit the Federal Trade Commission website at [www.ftc.gov](http://www.ftc.gov).

## **8. Updating/Correcting Your Personal Data**

If your personal data or account information is incomplete, inaccurate, or outdated, please contact your financial advisor or Lohr & Company, 540-948-6510.

## **9. Questions About Your Privacy**

Please email us at [info@lohrandcompany.com](mailto:info@lohrandcompany.com) if you have any questions or concerns regarding this policy.

## **10. Updates to This Online Privacy Policy**

This policy is subject to change and should be reviewed periodically. Changes to this policy will go into effect when the revised policy is posted to our websites. You accept the revised policy when you choose to use Lohr & Company's online services following these changes.



What Does Commonwealth Financial Network® Do with Your Personal Information?	
<b>Facts</b>	
<b>Why?</b>	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.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>• Name, email address, internet protocol (IP) address, address, social security number, date of birth, signature</li> <li>• Financial account number, financial account balances, trading history, payment history</li> <li>• Net worth, assets, income, investment experience, employment information</li> <li>• Transactions or credit relationships with nonaffiliated third parties</li> <li>• Medical information (if applying for insurance)</li> </ul>
<b>How?</b>	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons why financial companies can share their customers’ personal information, the reasons why Commonwealth and our independent contractors/advisors choose to share personal information, and whether you can limit this sharing.

Reasons Why We Can Share Your Personal Information	Does Commonwealth Share?	Can You Limit This Sharing?
<b>For our everyday business purposes</b> —to process 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 new products or services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates’ everyday business purposes</b> —we may share your personal information with our affiliates to process transactions, maintain your account(s), or respond to court orders and legal investigations.	Yes	No
<b>For our affiliates’ everyday business purposes</b> —information about your creditworthiness	No	We don’t share
<b>For nonaffiliates’ everyday business purposes</b> —to assist us in obtaining business or providing account maintenance or customer service to your account(s)	Yes	No
<b>For our affiliates to market to you</b> —to offer new products or services to you	No	We don’t share
<b>For nonaffiliates to market to you</b> —Commonwealth does not sell, share, or disclose your nonpublic personal information to nonaffiliated third-party companies. Information collected by our independent contractors/advisors may be shared.	No	Contact your advisor directly to limit the nonpublic personal information they may share
<b>For advisors who leave Commonwealth</b> —if you have a Commonwealth advisor servicing your account(s) who leaves Commonwealth to join another financial institution, the advisor may retain copies of your personal information so that they can continue to serve you at the new firm. In doing so, your advisor may share your information with the new firm but is otherwise required to keep confidential the personal information obtained from you while the advisor was affiliated with Commonwealth, and they may use it only to service your account(s). <b>Please note:</b> Certain states require affirmative consent to allow sharing. See below for more on your rights under state law.	Yes	Yes
<b>In the event that a Commonwealth advisor terminates their relationship with Commonwealth and you want to follow your advisor to their new firm, please do not request to limit our sharing.</b>		

**To Limit Our Sharing**

- Call Commonwealth’s Client Privacy Line at **844.668.9880**.
- Mail your request to **Commonwealth Financial Network, Attn: Privacy, 29 Sawyer Road, Waltham, MA 02453-3483**.

**Please note:** If you are a *new* customer, we can begin sharing your information from the date we provided you with this notice. When you are *no longer* our customer, 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 **844.668.9880** or go to **www.commonwealth.com**.

**Who We Are**

**Who is providing this notice?** Commonwealth Equity Services, LLC, doing business as Commonwealth Financial Network® (“Commonwealth”), a dually Registered Investment Adviser and broker/dealer, and its affiliates CES Insurance, LLC, and Advisor360°, LLC (collectively, “Commonwealth”), distribute a variety of financial products and services to you through our network of financial professionals who are independent Registered Representatives, Investment Adviser Representatives, and insurance agents (collectively, “advisors”). Securities are not offered or provided by Commonwealth on behalf of the federal government, and the offer of such securities is not sanctioned, recommended, or encouraged by the federal government.

**What We Do**

**How does Commonwealth protect my personal information?** To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. We protect your personal information in the following ways:

- We only grant access to your personal information to parties with whom we have executed confidentiality/nondisclosure agreements and who need that information to serve you or to assist us in conducting our operations.
- We have physical and electronic safeguards in place to ensure that we comply with our own policy, industry practices, and federal and state regulations.
- Our employees are trained in the proper handling of nonpublic personal information.

**How does Commonwealth collect my personal information?** Commonwealth collects nonpublic personal information from you, as well as from other sources. The sources and the information collected may include:

- Information you provide to us, to our affiliated entities, or to your advisor on applications and related forms, through discussions with our customer service staff, or on our website
- Information regarding your transaction history with us
- Information from other nonaffiliated third parties, including employers, associations, benefit plan sponsors, credit bureaus, and other institutions, if you transfer positions or funds to Commonwealth

**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.)

**What happens when I limit sharing for an account I hold jointly with someone else?** If you have a joint account, we will treat an opt-out direction by a joint customer as applying to all associated joint customers. Any account holder may express a privacy preference on behalf of the other joint account holders.

**Definitions**

**Affiliates** Companies related by common ownership or control. They can be financial and nonfinancial companies.  
• CES Insurance, LLC • Advisor360°, LLC • RightCapital, LLC

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

- This may include insurance companies, broker/dealers, investment advisers, mutual fund companies, banks, investment firms, third-party administrators, clearing firms, retirement plan sponsors, and other third parties.

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

- This may include banks, credit unions, or other financial institutions with which we have a joint marketing agreement.

**Other Important Information**

If you live in an “opt-in” state, 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.

**California and North Dakota residents:** For accounts with a California or North Dakota mailing address, we will not share your personal information with a financial company for joint marketing purposes, except as required or permitted by law.

**Nevada residents:** This notice is being provided pursuant to state law. If you prefer not to receive marketing calls, contact your advisor directly.

**Vermont residents:** For accounts with a Vermont mailing address, we will not share your creditworthiness information with our affiliates, except as required or permitted by law. For joint marketing with other financial companies, we will disclose only your name, contact information, and information about your transactions, unless otherwise required or permitted by law.