## ELE Advisory Services, Inc.

18700 West 10 Mile Road, Suite 100, Southfield, Michigan 48075 (248) 356-6555 (P) \* (248) 356-6578 (F)

A Registered Investment Adviser

## PRIVACY POLICY

Investment advisors, like all providers of personal financial services, are now required by law to inform their clients of their policies regarding privacy of client information. Investment advisors have been and continue to be bound by professional standards of confidentiality that are even more stringent than those required by law. Therefore, we have always protected your right to privacy.

#### TYPES OF NONPUBLIC PERSONAL INFORMATION WE COLLECT

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization.

#### PARTIES TO WHOM WE DISCLOSE INFORMATION

For current and former clients, we do not disclose any nonpublic personal information obtained in the course of our practice except as required or permitted by law. Permitted disclosures include, for instance, providing information to our employees and, in limited situations, to unrelated third parties who need to know that information to assist us in providing services to you. In all such situations, we stress the confidential nature of information being shared.

# PROTECTING THE CONFIDENTIALITY AND SECURITY OF CURRENT AND FORMER CLIENT'S INFORMATION

We retain records relating to professional services that we provide so that we are better able to assist you with your professional needs and in some cases, to comply with professional guidelines. In order to guard your nonpublic personal information, we maintain physical, electronic, and procedural safeguards that comply with our professional standards.

Please call if you have any questions, because your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.



Tel: 248-356-6555 Fax: 248-356-6578 MEMBER FINRA

#### **Privacy Notice**

ELE Wealth Solutions, Inc. provides securities services by means of its own internal operation and those of its other affiliated and unaffiliated third-party providers such as mutual fund and variable life insurance sponsors. ELE Wealth Solutions, Inc. acts as an introducing broker to its product sponsors, who in turn process the transactions and act as the account custodians. All of the above-named parties receive and maintain information about you that is related to and necessary for processing investments in your account.

#### WHERE DO WE OBTAIN THE INFORMATION

The information that we have comes directly from you. This includes such information as your name, address, and Social Security Number that you provided on applications, agreements, or other forms. In addition, we maintain records of each of your transactions and holdings processed by us. We also may obtain information about you, such as your credit history or other facts relating to creditworthiness, from a consumer-reporting agency.

## Important Information About Procedures for Opening a New Account:

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.

What this means for you: When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask for your driver's license or other identifying documents.

#### TO WHOM DO WE DISCLOSE THE INFORMATION

ELE Wealth Solutions, Inc. does not sell your non-public personal information. We provide information about current or former clients from the sources described above to parties outside of this firm only as described below:

**To other companies as necessary to process your business.** For example, we process your mutual fund and variable annuity transactions through product providers with whom we have dealer selling agreements. These parties must limit their use of the information to the purpose for which it was provided.

Where required by law or regulation. Examples include responses to a subpoena, court order or regulatory demand.

**As authorized by you.** You may direct us, for example, to send account statements or other account information to a third party.

**As otherwise authorized or permitted by law.** For example, the law permits us to respond to a request for information about you from a consumer-reporting agency.

## **CONFIDENTIALITY AND SECURITY**

We restrict access to information about you to those employees and authorized agents who need to know that information in order to provide products or services to you. We maintain physical, electronic and procedural safeguards to maintain the confidentiality of your information through to its destruction.

#### FINRA BrokerCheck Program

The FINRA has a program, BrokerCheck, whereby you may obtain information about a member firm or its representatives. You may obtain information by calling the FINRA BrokerCheck program's hotline at 1-800-289-9999 or by going to the FINRA BrokerCheck website at <a href="mailto:brokercheck.finra.org">brokercheck.finra.org</a>.

#### **Complaint Inquiries**

Customer complaints and any changes to your account record should be directed to our customer service department at 248-356-6555 or in writing to: ELE Wealth Solutions, Inc., 18700 W. 10 Mile Road, Southfield, MI 48075.

#### **SMS Privacy Policy**

#### INTRODUCTION

At the ELE Family of Companies, Inc., we are committed to protecting your privacy and ensuring the security of your personal information. This SMS Privacy Policy outlines our practices regarding the collection, use, and disclosure of your personal information when you interact with our financial services through SMS (Short Message Service).

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## This privacy statement is separate from other privacy policies. This includes the following:

 The ELE Advisory Services, Inc. and ELE Wealth Solutions, Inc. <u>privacy policies</u>, which more broadly address data collection through other digital platforms.

## CONSENTING TO TEXT MESSAGING

By using our SMS services, you consent to the terms and conditions outlined in this SMS Privacy Policy. If you do not agree with these terms, please refrain from using our SMS services. **Message and data rates may apply.** 

#### INFORMATION WE COLLECT

#### General

The information we collect on or through SMS may include:

- Name
- Contact Information (e.g., phone number)
- Any other information you provide during SMS interactions

All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

#### How we use your information

We may use your personal information for the following purposes:

- To provide you with financial information and services.
- To verify your identity for security purposes.
- To respond to your inquiries and provide customer support.
- To improve our SMS services and overall customer experience.

#### Disclosure of your information

We do not sell, rent, trade, or share your personal information to third parties for marketing purposes. However, we may disclose your information to the following parties:

- Our affiliated companies.
- Service providers who assist us in delivering SMS services.
- Regulatory authorities or legal entities when required by law.

All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

#### **Security Measures**

We employ robust security measures to protect your personal information from unauthorized access, disclosure, alteration, and destruction. These measures include encryption, access controls, and regular security assessments.

#### **Retention Period**

We will retain your personal information for as long as necessary to fulfill the purposes outlined in this SMS Privacy Policy and to comply with legal and regulatory requirements.

#### **Your Rights**

You have the following rights concerning your personal information:

- Access: You can request access to the personal information we hold about you.
- Correction: You can request corrections to inaccurate or incomplete personal information.
- Deletion: You can request the deletion of your personal information under certain circumstances.
- Opt-Out: You can opt-out of receiving SMS messages from us at any time.

To exercise these rights, please complete one of the following:

- Contact our client support at: <a href="mailto:info@elewealth.com">info@elewealth.com</a>
- Reply STOP to the message you received
- Reply HELP to the message to learn how to receive help

## **Messaging Practices**

ELE Family of Companies, Inc. issues SMS text messages for both single-use and recurring campaigns, depending on user opt-in preferences. Recurring campaign messaging frequency may vary. Consent to receive text messages is not a required condition of receiving ELE Family of Companies, Inc. client services.

#### **Supported Carriers**

ELE Family of Companies, Inc. SMS text messages are supported on major U.S. carriers, including AT&T, Verizon, T-Mobile, Sprint, Comcast, and MetroPCS. Please contact info@elewealth.com if your carrier is not included among these options.

#### **Changes to this Privacy Policy**

We may update this SMS Privacy Policy from time to time. Any changes will be posted on our website, and the revised policy will be effective immediately upon posting.

## **Contact Us**

If you have any questions, concerns, or requests regarding this SMS Privacy Policy, please contact us at: info@elewealth.com or 248-356-6555.

By using our SMS services, you acknowledge that you have read, understood, and agree to this SMS Privacy Policy. Your continued use of our SMS services constitutes your acceptance of any updates or changes to this policy.