



PRIVACY POLICY

Last Updated: July 2, 2026

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND HOW WE TREAT YOUR PERSONAL INFORMATION AS WELL AS YOUR CHOICES AND RIGHTS. IF YOU DO NOT AGREE WITH THIS POLICY AND OUR WEBSITE TERMS OF USE, YOU SHOULD NOT ACCESS OR USE THE SITE.

BY ACCESSING, VISITING, BROWSING, OR USING OUR SITE, SUBMITTING YOUR INFORMATION THROUGH OUR SITE OR OTHERWISE USING OUR SERVICES OR INTERACTING WITH US, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTOOD, AND AGREE WITH THE TERMS AND CONDITIONS OF THIS POLICY.

THE SITE IS INTENDED FOR USERS LOCATED IN THE UNITED STATES AND IS NOT INTENDED FOR USERS LOCATED IN OTHER COUNTRIES, INCLUDING THE EUROPEAN UNION AND THE EUROPEAN ECONOMIC AREA.

1. INTRODUCTION AND PURPOSE

Concurrent Investment Advisors, LLC (referred to herein as “**Concurrent**”, “**we**”, “**us**”, and “**our**”) is committed to protecting the privacy and security of the personal information we may collect, use, share, and otherwise process. We also believe in transparency and we are committed to informing you about how we treat the personal information that we collect and process.

This Privacy Policy (the “**Policy**”) describes our practices for handling personal information collected when you visit our website, <https://poweredbbyconcurrent.com>, or any other websites, platforms, or other online solutions that link to this Policy (collectively the “**Site**”).

This Policy does not apply to: (1) information collected by Concurrent that does not link to this Policy; (2) information collected by any third party, including through any application or content that may link or be accessible from our Site; or (3) any information governed by other privacy policies.

If you are a Concurrent consumer or customer and obtain a financial product or service with us, we will use and share your personal non-public information in accordance with our [RIA Privacy Policy](#). Please read our RIA Privacy Policy to learn how we collect, use, protect, and share your personal information and the options that may be available to you.

2. INFORMATION WE MAY COLLECT

We may collect the following information from you when you use the Site for the purposes listed below. The information we collect depends upon things such as the nature of our relationship, the method you communicate with us, the purpose for your interaction with us, and the choices you make.

We collect information about you from various sources and in various ways when you use our Site, including information you provide directly, information collected automatically, and information from third-party data sources.

- **Contact Information:** When you visit the Site, contact us via a contact form on the Site, submit a comment or question, or otherwise provide us your personal information, we may collect your first and last name, email address, telephone number, or other contact details.
- **Registration Information:** When you register for an account through the Site, we may collect additional information such as your username, password, and security questions to access portions of the Site where such information is required.
- **Device and Usage Information:** When you visit the Site, view or search content, or use our services, we and other third parties may automatically collect certain usage or network activity information from your browser, mobile device, computer, tablet or other devices or browsers you use, which includes the date and time of your visit, your Internet Protocol (IP) address, unique device identifier, domain server, your browser type, Internet Service Provider (ISP), operating system, the referring web page, access time, cookies, and data about which pages you visit. We may also collect information regarding your interactions with the Site or our advertising.
- **Cookies and Similar Technologies:** We may use cookies, pixels, and similar technologies as described in the “Cookies and Similar Technologies” section of this Policy. If you choose to disable cookies and similar technologies, some areas and features of the Site may

not work properly.

- **Geolocation Information:** This may include the IP address or other location information transmitted by a mobile or other device (depending upon your settings) when you interact with the Site.
- **Social Media Information:** If you engage with us on third-party social media platforms, such as Meta, Instagram, Twitter, or LinkedIn, we may collect and aggregate the personal information through your engagement with us, including all content, messages, and information that you provide to us and that you make publicly available on the profile through which you submitted such information to us.
- **Communications Data:** If you contribute to the Site, provide us with feedback, ask us questions, or otherwise communicate with us, in addition to your Contact Information, we will collect the subject matter of your message and any content or other information that you choose to provide. If you receive email communications from us, we may use certain tools to capture data related to if/when you open our message and if/when you click on any links or banners that may be contained within our emails to you. If you request information about our services, we may also collect information you choose to share about your goals, preferences, timeline, and other relevant details.
- Other information that you voluntarily share with us to facilitate use of the Site which is not specifically listed here. We will use such information in accordance with this Privacy Policy, as otherwise disclosed at the time of collection, in accordance with our applicable agreement with you, or to the extent necessary for providing the Site.

When you are asked to provide your information, you may choose not to provide us with your information or otherwise decline or use browser or device controls to prevent certain types of data collection. However, in some cases, if you choose not to provide information that is necessary to fulfill your requests or provide our services, you may not be able to access portions of the Site, or some services or features may not be available or fully functional. Certain information may be required by law or necessary for us to provide services you request.

3. HOW WE MAY USE YOUR INFORMATION

We may use the information described above in connection with the following purposes or otherwise to the extent permitted by law:

- **Providing Our Services To You:** We use your information to provide our services to you, which includes making our Site, services, and our content available to you; to serve you the content and functionality you request; to communicate about our services and responding to your feedback, requests, questions, or inquiries; to enhance your experience and provide you with a more personal and interactive experience; to improve and develop existing and new services, including evaluations of functionality and features and recognizing your devices and remembering your preferences and interactions; to ensure the privacy and security of our Site.
- **Operating Our Business:** We use your information to operate our business, such as to obtain or maintain insurance coverage, managing risks, obtaining professional advice, to enforce our terms and conditions, to comply with any contractual obligations, to mitigate risks to the privacy and security of our Site and operations, including fraud or phishing detection, to maintain our databases and back-ups; to enforce our Terms of Use, to manage our relationships with you; and to comply with your instructions or requests.
- **Communicating With You:** We use your information to communicate with you, such as to contact you directly by mail, telephone, email, or other electronic messaging service to in order to respond and provide the appropriate assistance to you, to keep records of our communications with you, to determine user interests, and for usage analytics purposes.
- **Marketing and Advertising:** We use your information to tailor our services so that they are more relevant to you, to understand your preferences and provide and improve support related to our product and service offerings, including targeted offers and advertising through the Site, on third-party sites, and via other communication mediums, to advertise our products and services, to inform you of new services, and to conduct research and analysis for marketing, business, and other operational purposes.
- **Fraud, Security, Legal Enforcement and Compliance:** We use your information to protect the security and integrity of our business and the Site, such as to enforce our agreements with you, to comply with federal, state, or local laws, to comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons, to cooperate with law enforcement agencies concerning conduct or activity that we may believe violates applicable law, and to establish, exercise, and/or defend legal rights or claims, whether in court, administrative, or other proceedings.

We may also use your information to accomplish any other purpose related to and/or ancillary to any of the purposes described in this Privacy Policy, for which your personal information was provided to us, or for which we have a legal basis under applicable law. We may create, disclose, and otherwise use information as de-identified or aggregated data which, upon aggregation and de-identification, are no longer treated as personal information subject to this Privacy Policy.

4. HOW WE MAY DISCLOSE YOUR INFORMATION

We may disclose or share your information described above in the following contexts or as otherwise permitted by applicable law:

- **Service Providers:** We may share your personal information with our service providers and other parties who perform functions on our behalf or at your direction for the purposes described in this Privacy Policy. This includes, but is not limited to, support our provision of services requested by you, to develop and maintain the Site, to provide technical support, to send marketing, promotions, and communications to you about our services, to enhance the security of our Site, for marketing and advertising services, and to assist and to assist with other legitimate purposes permitted by law. We may also disclose the personal information we collect to our analytics vendors and partners to develop aggregate analytics and business intelligence for our advertising and marketing purposes.
- **Corporate Affiliates:** We may share your information with our corporate affiliates, which may include our subsidiaries, divisions, or affiliates, to provide our products and for various purposes permitted by law.
- **Acquisition and Similar Transactions:** If we sell, transfer, or otherwise share some or all of our assets in connection with a merger, reorganization, liquidation, dissolution, bankruptcy, or sale of assets, we may disclose your personal information as a part of the assets transferred as a result of the transaction. For example, if another company acquires us, we will share your personal information with that company.
- **In Response to Legal Process or Defending Legal Claims:** We may disclose personal information as required by law, court orders, subpoena, or other legal process or if we reasonably believe such action is necessary to comply with the laws.
- **Professional Advisors:** We may share your personal information with our attorneys, accountants, and/or other fiduciaries and consultants that need access to your information to provide operational or other support on our behalf.
- **With Your Consent or at Your Direction:** We may ask, from time to time, if you would like us to share your personal information with other unaffiliated third parties who are not described elsewhere in this Privacy Policy. We may disclose your information in this context with your permission or upon your direction.
- **Third Parties:** We may provide personal information about you to third parties that may offer services specifically requested by you.
- **Deidentified or Aggregated Data:** We may share aggregated information, and information that does not identify any specific individual, such as groupings of demographic data and customer preferences, (i) for compliance with reporting obligations; (ii) for business or marketing purposes; and (iii) to assist us and others in understanding our users' interests, habits, and usage patterns for certain programs, content, services, marketing, and/or functionality.

5. COOKIES AND SIMILAR TECHNOLOGIES

Cookies

A "cookie" is a small file created by a web server that can be stored on your device (if you allow) for use either during a particular browsing session (a "session" cookie) or a future browsing session (a "persistent" or "permanent" cookie). "Session" cookies are temporarily stored on your device and only last until they expire at the end of your browsing session. "Persistent" or "permanent" cookies remain stored on your device until they expire or are deleted by you. Local stored objects (or "flash" cookies) are used to collect and store information about your preferences and navigation to, from, and on a website. First-party cookies are set by the website you are visiting, and they can only be read by that site. Third-party cookies are set by a party other than that website.

Other Similar Technologies

In addition to cookies, there are other automatic data collection technologies, such as Internet tags, web beacons, pixels (clear gifs, pixel tags, and single-pixel gifs), and navigational data collection (log files, server logs, etc.) that can be used to collect data as you navigate through and interact with a website. For example, pixels are small images on a web page or in an email that collect information about your browser or device and can set cookies. Web beacons are tiny graphics with unique identifiers that are used to understand browsing activity. UTM codes are strings that can appear in a URL when you move from one web page or website to another. The string can represent information about your browsing, such as which advertisement, page, or publisher sent you to the receiving website.

Cookies and Similar Technologies We May Use And Why We Use Them

To optimize the user experience and subject to your choices and applicable law, our Site may use cookies and similar tracking technologies to operate core features, understand usage, improve performance and design, support advisor recruitment and related efforts, and enhance security. The technologies we may use include cookies, web beacons (also called pixel tags or clear GIFs), local storage, SDKs, and tags/scripts. These technologies may collect information such as device identifiers, browser type and settings, operating system, IP address (which may be considered personal information under applicable law), general location, referring/exit pages, pages viewed, links clicked, time spent, and other interactions with the Site.

Cookies may be set by Concurrent (first-party) and by third parties that provide services to us (third-party), including our hosting, analytics, security, and marketing/advertising vendors.

The cookies and similar technologies used on the Site include the following:

Essential: Essential cookies are necessary for basic features and functionality of the Site. Without these essential cookies, the Site will not perform properly and we may not be able to provide you with certain services you have asked for, provide access to secure areas, and choices you have made for better functionality cannot be provided.

Functionality: Functionality cookies help us customize content on the Site based on your preferences. We use functionality cookies to remember choices you've made or information you've provided, such as your username or the region you are in. This allows us to tailor your experience on the Site to your preferences. For example, authentication cookies are functionality cookies that are used for the duration of a session (or persistent, if you agree to the "remember me" function) to allow users to authenticate themselves on subsequent visits or gain access to authorized content across pages on the Site.

Analytics and Performance: We may use analytics and performance tools, such as Google Analytics, to help provide us with information about traffic to our Site and use of our Site, which Google may share with other services and websites that use the collected data to contextualize and personalize the ads of its own advertising network. We may use analytics tools to collect information about your use of the Site and enable us to improve the way they work and operate, information regarding what the most frequently visited pages on the Site are, help us record and debug any issues you may have with the services, and evaluate the effectiveness of our advisor recruitment campaigns. These analytics cookies do not allow us to see the usage of a single user but do allow us to see overall patterns of usage on the services. We do not examine this information for individually identifying information, but we do use this information to understand the traffic on our Site.

Advertising: Advertising cookies and other similar technologies are used by us to enable us to understand your interests and provide advertising and marketing that may be more relevant to you. We use these technologies primarily to support advisor recruitment and related marketing efforts. We may also use these cookies to target and re-target visitors to our website with digital advertising that is most relevant to the user. These cookies are also used to limit the number of times you see an advertisement or particular content, as well as help measure the effectiveness of an advertising or marketing campaign.

We also use third-party digital tracking technologies and receive data from such technologies including, but not limited to, the following:

Google Analytics. We may use Google Analytics to collect and process statistical data about the number of people using the Site and to better understand how they find and use the Site. We use this information to implement Google advertising features such as dynamic remarketing, interest-based advertising, audience targeting, behavioral reporting, demographics and interests reporting, user segment analysis, device reporting, display advertising, video ads reporting, and impression reporting. The data collected includes data related to your device/browser, your IP address, and on-site activities to measure and report statistics about user interactions. The information stored is reduced to a random identifier. Any data collected is used in accordance with this Policy and Google's privacy policy. Any data collected by is used in accordance with this Policy and Google's Privacy Policy. You can learn more about Google's restrictions on data use by visiting the [Google Privacy Policy](#). You can learn more about Google's advertising services by visiting its [Technologies](#) page along with information on [Google Analytics](#).

You can opt-out of Google's use of cookies or device identifiers by visiting [Google's Ads Settings](#).

You can also opt-out of Google Analytics, by installing the [Google Analytics Opt-out Browser Add-on](#) feature. For more details, visit the [Google Analytics Opt-out Browser Add-on page](#).

HubSpot: We use HubSpot to create and share marketing, sales, and customer service content and to support advisor recruitment and related marketing efforts. HubSpot may use cookies or similar technologies to analyze trends and monitor how visitors interact with our Site, such as pages visited, time on site, and date and time of your visit. On our behalf, HubSpot may also collect personal data such as your first and last name, email address, physical address, or other information about you. This information helps us improve the experience on our Site and analyze inbound marketing opportunities and advisor recruitment. Information about HubSpot's privacy practices may be found at [HubSpot's Privacy Policy](#).

LinkedIn Pixel. We may use LinkedIn Marketing Solutions Pixel (also known as the LinkedIn Insight Tag), which is a snippet of JavaScript code implemented on our Site to track page views and conversions and to provide insight into post-click and view-through conversions of our advertising campaigns on LinkedIn. LinkedIn may collect information relating to your visit to our Site, including referring URL, IP address, device and browser characteristics, and timestamp. LinkedIn does not share this information with us in a way that directly identifies you and generally provides us with aggregated reports and alerts about Site visitors and advertising performance. However, LinkedIn may use this information to serve ads elsewhere, subject to its own policies and your LinkedIn account settings. For more information on how LinkedIn uses this information, please review LinkedIn's Privacy Policy.

How Do Our Advertising and Marketing Partners Use Cookies for Interest-Based Advertising?

We may use third parties such as advertising networks and other content providers to serve targeted ads on our Site and on other websites like social media sites. This practice is referred to as interest-based advertising. We use these advertising and marketing activities primarily for advisor recruitment and related marketing purposes. These advertising networks and/or content providers may use cookies and similar tracking technologies to uniquely distinguish you, your web browser, or your device and report certain information about your visits to our Site and other websites (e.g., web pages you visit and your response to ads) in order to measure the effectiveness of our marketing campaigns

and to deliver ads that may be more relevant to you, both on and off the Site and across your devices, including on social media sites. This information may also be used to evaluate our online advertising campaigns.

Some third parties may use data collection technologies to collect information from our Site and combine it with other information they have collected relating to your web browser's activities across their network of websites, where permitted. We do not control these third parties' technologies or how they may be used. If you have questions about targeted content, you should contact the responsible party directly or consult their privacy policies. Please see examples of the opt-outs offered below.

How Can You Opt-Out from Interest-Based Advertising?

Some advertising networks we may use for these purposes may be members of the Digital Advertising Alliance ("DAA") or the Network Advertising Initiative ("NAI"). Please visit the websites below to learn more about interest-based advertising and to opt out of receiving personalized advertising or content from participating third-party advertising companies:

Digital Advertising Alliance: <https://optout.aboutads.info/?lang=EN&c=2#%2F>

National Advertising Initiative: <https://optout.networkadvertising.org/?c=1#%2F>

Please note that if you opt-out, you may still receive online advertising from us, but it will not be tailored to your interests based on online behavioral information about you. To successfully opt-out, you must have cookies enabled in your web browser (see your browser's instructions for information on cookies and how to enable them). Your opt-out only applies to the web browser you use, so you must opt-out of each web browser on each computer you use. Once you opt-out, if you delete your browser's saved cookies, you will need to opt-out again.

Choices About Cookies

Most web browsers are set by default to accept cookies. If you do not wish to receive cookies, you may set your browser to refuse all or some types of cookies or to alert you when cookies are being stored. These settings may affect your enjoyment of the Site's functionality. Adjusting the cookie settings may not fully delete all of the cookies that have already been created. To delete them, you should review your web browser settings after you have changed your cookie settings.

The links below provide additional information about how to disable cookies or manage the cookie settings. PLEASE NOTE: These third-party links are provided for your convenience and we may not actively monitor the content of these links.

Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>

Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Internet Explorer: <http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies>

Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac> and <https://support.apple.com/en-us/HT201265>

For more information on how to modify your browser settings to block or filter cookies, visit <http://www.aboutcookies.org/>. You may learn more about internet advertising practices and related consumer resources at <https://youradchoices.com/control>, <https://thenai.org/about-online-advertising/faq>, and <http://www.networkadvertising.org/choices>.

Web Scraping. You are strictly prohibited from using any automated system, software, or other methods, including but not limited to scripts, bots, crawlers, scrapers, or other data mining tools, to access, acquire, copy, monitor, or collect any data, content, or other information from the Site without prior written consent from us. This prohibition extends to the use of any technology designed to bypass or circumvent measures we employ to restrict access to certain content or areas of the Site.

6. RETENTION OF PERSONAL INFORMATION

We retain and use your other information for as long as is necessary to fulfill the purposes for which it was collected, to comply with our business requirements and legal obligations, to resolve disputes, to protect our assets, to provide our services, and to enforce our agreements.

We take reasonable steps to delete the personal information we collect when: (1) we have a legal obligation to do so; (2) we no longer have a purpose for retaining the information; or (3) if you ask us to delete your personal information unless we determine that doing so would violate our existing, legitimate, legal, regulatory, dispute resolution, contractual, or similar obligations. We may also delete your information if we believe it is incomplete, inaccurate, or that our continued storage of it is contrary to our objectives or legal obligations. When we delete data, it will be removed from our active servers and databases, but it may remain in our archives when it is not practical or possible to delete it.

To the extent permitted by law, we may retain and use anonymous, de-identified, or aggregated information for performance reporting, benchmarking, and analytic purposes and for product and service improvement.

7. SECURITY AND PROTECTION OF PERSONAL INFORMATION

We recognize the importance of safeguarding your personal information and we endeavor to maintain reasonable and appropriate physical, technical, and organizational safeguards to protect your personal information against accidental loss and unauthorized access, use, alteration, or disclosure, and to detect fraudulent identity verification activity and mitigate risks concerning your personal information.

While our security measures seek to protect your information in our possession, no security system is perfect, and no data transmission is 100% secure. As a result, while we strive to protect your information, we cannot guarantee or warrant the security of any information transmitted to or from the Site. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Site.

8. YOUR RIGHTS AND CHOICES REGARDING PERSONAL INFORMATION

Please use the "Contact Us" details provided at the end of this Policy to exercise your rights and choices under this Policy. If you would like to manage, change, limit, or delete your personal information, or if you no longer want to receive any email, postal mail, or telephone contact from us in the future, such requests may be submitted via the Contact Us details at the end of this Privacy Policy. We honor such requests when we are required to do so under applicable law.

Email Opt-Out. If you no longer wish to receive communications from us via email, you may opt-out by clicking the "unsubscribe" link at the bottom of our emails or by contacting us via the "Contact Us" details at the end of this Policy and providing your name and email address so that we may identify you in the opt-out process. Once we receive your instruction, we will promptly take corrective action.

Cookies: You may be able to set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. You may also adjust your cookie preferences by using the cookie consent banner, if available.

Accuracy and Updating Your Information. Our goal is to keep your personal information accurate, current, and complete. If any of the personal information you have provided to us changes, please update it in your user/account profile, or let us know via the "Contact Us" details at the end of this Policy. We are not responsible for any losses arising from any inaccurate, inauthentic, deficient, or incomplete personal information that you provide to us.

Complaints. If you believe your rights relating to your personal information have been violated, please contact us via the "Contact Us" details provided at the end of this Policy.

9. INDIVIDUAL RIGHTS

In addition to the California Privacy Rights described below, to the extent you are a resident of certain U.S. states with comprehensive state privacy laws, you may be eligible for one or more of the following consumer rights where authorized by applicable U.S. state privacy laws. This section provides an overview of these rights which we honor where required by applicable law:

- **Right to Access.** Subject to certain conditions set forth in the applicable U.S. state privacy laws, you have the right to know and see what personal information we have collected about you and receive a copy of such information in a portable format, purposes for which we collect your personal information, recipients of your personal information to whom we disclose or share, which in some states may include categories of personal information collected, categories of sources of collection, business or commercial purposes for data processing, and categories of 3rd parties with whom we disclose that information.
- **Right to Correct.** Subject to certain conditions and exceptions set forth in the applicable U.S. state privacy laws, you have the right to request that we correct any inaccurate personal information that we have collected about you.
- **Right to Delete.** Subject to certain conditions and exceptions set forth in the applicable U.S. state privacy laws, you have the right to request that we delete the personal information we have collected about you.
- **Right to Opt-Out.** Subject to certain conditions set forth in the applicable U.S. state privacy laws, you have the right to opt out of targeted advertising, profiling, the sale or sharing of your personal information, to the extent such instances occur (as defined under applicable state laws). We do not have actual knowledge that we sell personal information of minors under 16 years of age.
- **Right to Non-Discrimination.** You have the right not to be discriminated against for exercising any of your rights under any applicable U.S. state privacy laws.
- **Right to Appeal.** To the extent the applicable U.S. state privacy laws provide such rights, you may appeal our denial to act on your consumer rights under the applicable state privacy laws within a reasonable time. We will respond within designated period for responding to U.S. data subject requests and may exercise the right to extend this response period (to the extent authorized by applicable state privacy laws). Please submit any appeal requests via email to concurrentdata@poweredbyconcurrent.com.
- **Right to Limit Use and Disclosure of Sensitive Personal Information.** If any U.S. state privacy laws classify your personal information we

collect as “sensitive personal information,” we use such data reasonably necessary to provide and perform our services as requested by you or as otherwise permitted by law.

- **Right to Withdraw Consent.** If you have provided your consent to the collection, processing and transfer of your personal information, you have the right to fully or partially withdraw your consent. To withdraw your consent, please notify us using the information in the Contact Us section of this Policy and you may follow opt-out links on any marketing communications sent to you.

If you have questions or concerns regarding this Section or would like to exercise your consumer rights (to the extent available under applicable U.S. state privacy laws), please use the “[Contact Us](#)” details at the end of this Policy.

10. THIRD-PARTY SITES

This Policy only applies to the Site and it does not apply to any third-party websites or applications.

The Site may contain links to, and media or other content from, third parties. These links are to external resources and third parties that have their own privacy policies. Because of the dynamic media capabilities of the Site, it may not be clear to you which links are to external, third-party resources. If you click on an embedded third-party link, you will be redirected away from the Site to the external third-party website. You can check the URL to confirm that you have left the Site.

We cannot and do not (1) guarantee the adequacy of the privacy or security practices employed by or the content and media provided by any third parties or their websites, (2) control third parties’ independent collection or use of your information, or (3) endorse any third-party information, products, services or websites that may be reached through embedded links on the Site. Any information provided by you or automatically collected from you by a third party will be governed by that party’s privacy policy and terms of use. If you are unsure whether a website or application is controlled, affiliated, or managed by us, you should review the privacy policy and practices applicable to each linked website or application.

11. CHILDREN’S PRIVACY

Our Site is not directed to children under the age of 18, nor is information knowingly collected from children under the age of 18. If you are under 18, please do not use or provide any information on the Site (including, for example, your name, telephone number, or email address). If we learn that we have collected or received personal information from a child under the age of 18 without a parent’s or legal guardian’s consent, we will take steps to stop collecting that information and delete it. If you believe we might have any information from or about a child under the age of 18, please contact us via the “Contact Us” details provided at the end of this Policy.

For more information about COPPA, please visit the Federal Trade Commission’s website at:

<https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>.

12. UPDATES AND CHANGES TO THIS POLICY

We may add to, change, update, or modify this Privacy Policy from time to time. Should this Privacy Policy change, we will post all changes to this Privacy Policy on this page and any such changes, updates, or modifications will be effective immediately upon posting. If we make material changes, we will also notify you through a notice on the homepage of the Site for a reasonable period of time. We may also, in our discretion, notify you of changes to this Privacy Policy via email. The date on which this Privacy Policy was last modified is identified at the beginning of this Privacy Policy.

You are expected to, and you acknowledge and agree that it is your responsibility to, carefully review this Policy prior to using the Site, and from time to time, so that you are aware of any changes. Your continued use of the Site after the “Last Updated” date will constitute your acceptance of and agreement to such changes and to our collection and sharing of your information according to the terms of the then-current Privacy Policy. If you do not agree with this Policy and our practices, you should not use the Site.

13. CALIFORNIA RESIDENTS

All terms used in this section shall have the meanings given in the California Consumer Privacy Act (“CCPA”), where applicable.

Please note that Concurrent is subject to the Gramm-Leach-Bliley Act (“GLBA”). The CCPA excludes certain personal information from its scope including, without limitation, personal information collected, processed, sold, or disclosed subject to the GLBA. Therefore, for example, if you are a client of Concurrent, any information you provided in conjunction with the financial products or services provided by us is subject to the GLBA and exempt from the CCPA. For additional information regarding our collection, use, and disclosure of personal information subject to the GLBA, and information relating to your choices with respect to this information, please see our [RIA Privacy Policy](#).

CCPA Notice at Collection

We collect and process personal information as described in the above Information We May Collect & How We May Use Information section of this Policy. The relevant CCPA categories for this information are indicated below.

Category	Description
Identifiers	Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
Personal information described in Cal. Civ. Code § 1798.80(e)	Examples: A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, or medical information.
Protected classification characteristics under California or federal law	Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status.
Internet or other similar network activity	Examples: Browsing history, search history, information regarding a consumer's interaction with an internet website application, or advertisement.
Geolocation data	Examples: Physical location or movements.
Sensory data	Examples: Audio, electronic, visual, or similar information.
Sensitive Personal Information	Examples: Social Security number, driver's license number, state identification number, passport number, account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account, precise geolocation information, racial or ethnic origin, religious, or philosophical beliefs, or union membership, contents of mail, email, and text messages unless the business is the intended recipient of the communication, genetic data, biometric data for the purposes of uniquely identifying a consumer, health information, sex life or sexual orientation information. **We only collect Sensitive Personal Information for legitimate business purposes appropriate for the use and disclosure of Sensitive Personal Information as defined in the California Privacy Laws, and do not otherwise use it to infer characteristics about you.

Retention Period: We will retain and use these categories of personal information for an appropriate period of time as is necessary to fulfill the purposes for which it was collected, to comply with our business requirements and legal obligations, to provide our services, and other purposes to the extent provided in this Privacy Policy. We will take reasonable steps to delete the personal information when (1) we have a legal obligation to do so; (2) we no longer have a purpose or obligation for retaining the information; or (3) if you ask us to delete the information unless there is an applicable exception to deleting the information under the CCPA. We are required to maintain records of Consumer requests submitted under the CCPA, which may include these categories of personal information, and how we responded to such requests for at least twenty-four (24) months. Such information related to California consumer requests is retained only for recordkeeping purposes.

Exclusions from Personal Information: Personal information does not include:

- Publicly available information or lawfully obtained, truthful information that is a matter of public concern.
- Consumer information that is deidentified or aggregated.
- Information excluded from the scope of the CCPA including, but not limited to personal information collected, processed, sold, or disclosed subject to the Gramm-Leach-Bliley Act (GLBA) or the California Financial Privacy Act.

Please keep in mind that much of the information we collect from you is to obtain or provide a financial product or service. Accordingly, such information is exempt from the CCPA since it is subject to the GLBA or other applicable exemptions.

Categories of Sources: We collect the personal information in this Privacy Policy directly from you when you provide it to us, automatically as you navigate through our Site, and from third parties, including business partners and public sources, as applicable.

Business and Commercial Purposes for Collecting: We have collected the categories of personal information listed above for the purposes identified in the "How We May Use Your Information" in Section 3 of this Policy.

Categories of Personal Information Disclosed for a Business Purpose: We have disclosed the following categories of personal information to service providers or contractors for a business purpose, or upon your consent to third parties, during the preceding 12 months. We have disclosed each category of personal information to some or all of the following categories of third parties: (1) affiliates; (2) advisors (e.g., accountants, attorneys); (3) service providers (e.g., data analytics, data storage, mailing, payment processing, administration, technical support); (4) marketing providers; (5) investors; and (6) as required by law, to government agencies, law enforcement, and regulatory authorities.

- Identifiers
- Categories Described in the Customer Records Statute
- Characteristics of Protected Classifications
- Internet or Other Electronic Network Activity Information
- Geolocation Data
- Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information
- Sensitive Personal Information

Personal Information Sold or Shared: We may sell or share the following categories of personal information:

- Identifiers
- Personal information described in Cal. Civ. Code § 1798.80(e)
- Internet or other similar network activity

No Financial Incentives: We do not offer financial incentives or any price or service difference in exchange for the retention or sale of your personal information.

Limited Use of Sensitive Personal Information: We only use or disclose sensitive personal information for purposes permitted by the CCPA and to which the right to limit does not apply.

Non-Discrimination: You have the right not to receive discriminatory treatment by us due to your exercise of the rights provided by the CCPA. We do not offer financial incentives and price or service differences.

California Consumer Rights and Choices

The CCPA provides Consumers with specific rights regarding their Personal information. This section describes your rights and explains how to exercise those rights. You may submit requests to us as described below and we honor those rights where they apply.

Right to Know: You have the right to request that we disclose Personal information that it has collected, sold, or shared about you. This includes a request for any or all of the following:

- The categories of Personal information we have collected about you.
- The categories of sources from which the Personal information is collected.
- The categories of personal information that we have sold or shared for a Business purpose about you.
- The categories of third parties to whom the Personal information was sold or shared for a Business purpose.
- The specific pieces of Personal information we collected about you.
- The Business or commercial purpose for collecting, selling, or sharing Personal information.

Right to Delete: You have the right to request that we delete any Personal information that we have collected, sold, or shared about you.

Right to Limit: In certain circumstances, you have the right to limit the use and disclosure of Sensitive personal information. Our use of your Sensitive personal information is solely for Business purposes and not for those purposes for which a Consumer may exercise a right to limit the use or disclosure under the CCPA. Therefore, we include this disclosure of information for informational purposes only.

Right to Opt-Out of Sale/Sharing: You have the right to direct a business that Sells or Shares Personal information about you to third parties to stop doing so.

Right to Correct: You have the right to request that we correct inaccurate Personal information that we maintain about you. Our goal is to keep your Personal information accurate, current, and complete.

Other California Privacy Rights: Under California Civil Code Section 1798.83, California residents who provide personal information in obtaining products or services for personal, family, or household use may be entitled to request and obtain from us, once a calendar year,

information about the information we shared, if any, with other businesses for direct marketing uses. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing, if any, will be included in our response. As part of the California Online Privacy Protection Act, all users of our Site may make any changes to their information at any time by contacting us at concurrentdata@poweredbyconcurrent.com.

How to Submit Consumer Requests

You may submit a request a Request to Know, Request to Delete, or Request to Correct by either:

- Calling us at (833) 227-8447; or
- Emailing concurrentdata@poweredbyconcurrent.com with the subject line "State Privacy Rights Request"

You may submit a Request to Opt-Out of Sale/Sharing by:

- Emailing concurrentdata@poweredbyconcurrent.com with the subject line "Do Not Sell or Share My Personal Information"
- Submitting a Data Privacy Rights Request; or
- Calling us at (833) 227-8447

Limitations: We are committed to responding to requests in accordance with applicable law. However, your rights are subject to certain limitations including, but not limited to, the following:

- We are only required to respond to Requests to Know twice in a 12-month period.
- A response to a Request to Know may be limited to the 12-month period preceding receipt of the request if it would be impossible, involve disproportionate effort, or the request is for data for a specific time period.
- We are prohibited from disclosing certain specific pieces of Personal information in response to a Request to Know including, but not limited to, Social Security numbers, driver's license numbers, and financial account numbers.

14. CONTACT US

For more information, or if you have any questions or concerns regarding this Privacy Policy, you may contact us using the information below, and we will do our best to assist you. Please note, if your communication is sensitive, you may wish to contact us by postal mail.

In Writing: Concurrent Investment Advisors, LLC

100 S. Ashley Drive, Suite 830

Tampa, Florida 33602

By Email: concurrentdata@poweredbyconcurrent.com