



# CALIFORNIA PRIVACY POLICY

## BUSINESS CONTACTS

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In this California Privacy Policy, "Wedbush" (also referred to as "we," "us," and "our") refers to Wedbush Financial Services, LLC; Wedbush Securities Inc.; WAM Capital, LLC; Wedbush Asset Management, LLC; Wedbush Capital Management, LLC; Wedbush Capital; Wedbush Futures; Wedbush Securities Advanced Clearing Services and Kluis Commodity Advisors. California residents with whom we have business relationships have certain additional rights over the personal information ("PI") that we collect from or about you. This is your "California Personal Information." This California Privacy Policy for Business Contacts describes our Information Practices, the rights you have with respect to your California Personal Information, and how you can exercise those rights.

### Personal Information We Have Collected in the Last 12 Months.

The following table lists the categories of California Personal Information we may have collected about you in the last 12 months, the categories of sources from which we have collected it, and why we have collected it.

Categories of PI collected	Categories of sources from which we collect PI	Business or commercial purpose for collecting PI
Identifiers, such as your name, business IP address, business address, business account name, business e-mail address, telephone number(s) and signature.	<ul style="list-style-type: none"><li>• You</li><li>• Third parties, such as other companies</li></ul>	<ul style="list-style-type: none"><li>• To market, provide and/or receive products and services to or from your organization.</li><li>• To comply with legal requirements.</li></ul>
Commercial information, such as records of products or services purchased or considered.	<ul style="list-style-type: none"><li>• You</li><li>• Third parties, such as other companies</li></ul>	<ul style="list-style-type: none"><li>• To market, provide and/or receive products and services to or from your organization.</li><li>• To comply with legal requirements.</li></ul>
Audio, electronic and visual information, such as voice recordings when you call us on a recorded line, or your photograph if you visit a location with security cameras.	<ul style="list-style-type: none"><li>• You</li></ul>	<ul style="list-style-type: none"><li>• To market, provide and/or receive products and services to or from your organization.</li><li>• To maintain security and detect fraud.</li></ul>
Professional or employment-related information, including	<ul style="list-style-type: none"><li>• You</li><li>• Third parties, such as other companies.</li></ul>	<ul style="list-style-type: none"><li>• To market, provide and/or receive products and services to or from your organization.</li></ul>

Categories of PI collected	Categories of sources from which we collect PI	Business or commercial purpose for collecting PI
securities licenses and certifications.		<ul style="list-style-type: none"> <li>• To comply with legal requirements.</li> </ul>
Geolocation data	<ul style="list-style-type: none"> <li>• You, when you visit <a href="http://www.Wedbush.com">www.Wedbush.com</a>.</li> </ul>	<ul style="list-style-type: none"> <li>• To market, provide and/or receive products and services to or from your organization.</li> </ul>
Audio, electronic and visual information, such as voice recordings when you call us on a recorded line, or your photograph if you visit a location with security cameras.	<ul style="list-style-type: none"> <li>• You</li> </ul>	<ul style="list-style-type: none"> <li>• To market, provide and/or receive products and services to or from your organization.</li> <li>• To maintain security and detect fraud.</li> </ul>
Professional or employment-related information.	<ul style="list-style-type: none"> <li>• You</li> <li>• Third parties, such as other companies</li> </ul>	<ul style="list-style-type: none"> <li>• To market, provide and/or receive products and services to or from your organization.</li> <li>• To comply with legal requirements.</li> </ul>
Inferences drawn from any of the information that we collect about you and your business or organization.	<ul style="list-style-type: none"> <li>• You</li> <li>• Third parties, such as other companies</li> </ul>	<ul style="list-style-type: none"> <li>• To market, provide and/or receive products and services to or from your organization.</li> <li>• To comply with legal requirements.</li> <li>• To maintain security and detect fraud.</li> </ul>
Information regarding your electronic network activity such as internet browsing history, usage and contents of e-mails that you send to us.	<ul style="list-style-type: none"> <li>• You</li> </ul>	<ul style="list-style-type: none"> <li>• To advertise and market our products and services, and/or to receive products and services to or from your organization.</li> <li>• To monitor activities, to maintain the security of our systems, and to detect improper activity.</li> </ul>
Sensitive personal information, including the log-in and financial account number for your business or organizational accounts in combination with any security or access code or password allowing access to the account.	<ul style="list-style-type: none"> <li>• You</li> </ul>	<ul style="list-style-type: none"> <li>• To provide a better client experience and enhanced functionality.</li> <li>• To service your accounts and provide financial products and services to you.</li> <li>• To monitor activities, to maintain the security of our systems, and to detect improper activity.</li> </ul>

Categories of PI collected	Categories of sources from which we collect PI	Business or commercial purpose for collecting PI
Commercial information regarding expenses or invoices that you ask us to pay.	• You	• To pay for expenses, products and services.

### Categories of Personal Information We Have Sold or Shared in the Last 12 Months.

We do not sell, share or disclose to third parties any California Personal Information we collect from business contacts (including service providers and vendors), prospective business contacts in those roles.

If you have visited our public websites and have accepted our performance cookies, we have shared your IP address, the URL you came from, and your interaction with the websites with analytics providers, third-party advertising networks, and social media platforms for their use in cross-context behavioral advertising across multiple websites.

### Consumers Under the Age of 16.

We do not have actual knowledge that we sell or share California Personal Information of minors under 16 years of age.

### Sensitive Personal Information.

We use and disclose sensitive California Personal Information only as permitted by law.

### Your Privacy Rights.

**The right to know.** You have the right to know what California Personal Information we have collected about you, including the categories of California Personal Information, the categories of sources from which the California Personal Information was collected, the business or commercial purpose for collecting, selling or sharing California Personal Information, the categories of third parties to whom we disclose California Personal Information, and the specific pieces of California Personal Information we have collected about you.

**The right to delete.** You have the right to delete certain California Personal Information that we have collected from you, subject to certain exceptions.

**The right to correct.** You have the right to correct inaccurate California Personal Information that we maintain about you.

**The right to opt-out.** You have the right to opt-out of the sale or sharing of your California Personal Information. Our Notice of Right to Opt-Out of Sale or Sharing is available [here](#).

**The right to limit use of sensitive personal information.** If a business uses or discloses sensitive California Personal Information for reasons other than those permitted by law, you have the right to limit the use and disclosure of that information. We use or disclose sensitive California Personal Information only as permitted by law.

**The right not to receive discriminatory treatment.** You have the right not to receive discriminatory treatment by us for the exercise of your privacy rights, including the right not to be retaliated against for the exercise of your privacy rights.

## **How You Can Exercise Your Rights.**

To submit a request to know, delete, or correct your California Personal information, call us (toll-free) at (800) 834-2153 or contact us by e-mail at [privacy@wedgebush.com](mailto:privacy@wedgebush.com).

**We will confirm receipt of your request.** We will acknowledge receipt of your request within 10 business days.

**We will verify your identity.** We will match pieces of personal information provided by you with personal information maintained by us that we have determined are reliable. We may also require that you submit a signed declaration under penalty of perjury stating that you are the individual whose personal information is the subject of the request. Our verification process will vary depending on the nature of your request and the sensitivity of the information. In some instances there is no reasonable method by which we can verify your identity. This is the case, for example, when you visit our website. In that circumstance, we collect your Internet Protocol address and information about your activity on our website, but we do not associate the information with any identifiable person.

**We will respond.** We will respond to your request no later than 45 calendar days after we receive the request. If we cannot respond to your request within that time, we may notify you that we may take up to an additional 45 calendar days to respond, and we will explain why we need additional time.

**You may designate an authorized agent to submit a request on your behalf.** You may authorize another person to submit a request to know, delete or correct your California Personal Information. To have another person submit a request on your behalf, call us (toll-free) at (800) 834-2153 or contact us by e-mail at [privacy@wedgebush.com](mailto:privacy@wedgebush.com) and tell us that you would like to authorize another person to submit a consumer privacy request on your behalf. You will need to provide us with written permission authorizing the other person to submit a request to know, delete or correct on your behalf. We will give you instructions on how to send the written authorization to us. We will still verify your identity and will verify that you have given your authority to the other person.

## **How We Process Opt-Out Preference Signals.**

An opt-out preference signal is a signal that is sent by a platform or browser that clearly communicates your choice to opt-out of the sale and sharing of personal information. We process opt-out preference signals in a frictionless manner. You can implement an opt-out preference signal through the privacy controls available on your web browser, or by downloading a browser extension that can be enabled to support your single opt-out preference signal. Your opt-out preference signal will apply to your device's browser. To learn more about how to implement opt-out preference signals and global privacy controls, please consult your browser's privacy settings or visit [Global Privacy Control](#).

## **Contact for More Information.**

If you have questions or concerns about our privacy policies and practices, you may call us (toll-free) at (800) 834-2153 or contact us by e-mail at [privacy@wedgebush.com](mailto:privacy@wedgebush.com).

## **Date Updated.**

March 2023