



# CALIFORNIA PRIVACY POLICY

## CLIENTS, PROSPECTIVE CLIENTS, WEBSITE VISITORS AND MOBILE APP USERS

---

In this California Privacy Policy, "Wedbush," "we," "us," and "our" refers to Wedbush Securities Inc.; Wedbush Securities Advanced Clearing Services; Wedbush Futures; Wedbush & Co., LLC; Wedbush Financial Services, LLC; Wedbush Capital Management, LLC; and Kluis Commodity Advisors. California residents have additional rights over their personal information ("PI") that is not already protected by existing federal privacy laws. This is your "California Personal Information." This California Privacy Policy describes our Information Practices, the rights you have with respect to that information, and how you can exercise those rights. This information supplements the information contained in our federal [Privacy Notice](#).

### **Personal Information We Have Collected in the Past 12 Months.**

The following table lists the categories of personal information we may have collected about you in the last 12 months, the categories of sources from which we have collected it, and how we will use the information. Some of this PI may be deemed California Personal Information, to which you have additional rights.

Categories of PI collected	Categories of sources from which we collect PI	Business or commercial purpose for collecting PI
Identifiers, such as your name, address, Internet Protocol (IP) address, device identifier, e-mail address, account name, telephone number(s), signature and sensitive personal information such as social security number, driver's license number, and passport number.	<ul style="list-style-type: none"><li>• You</li><li>• Third parties, such as credit bureaus, affiliates, and other companies</li></ul>	<ul style="list-style-type: none"><li>• To service your accounts and provide financial products and services to you.</li><li>• To comply with legal requirements.</li><li>• To detect fraud and security incidents and analyze activity on our websites.</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 credit bureaus, affiliates, and other companies</li></ul>	<ul style="list-style-type: none"><li>• To service your accounts and provide financial products and services to you.</li><li>• To market our financial products and services to you.</li></ul>

Categories of PI collected	Categories of sources from which we collect PI	Business or commercial purpose for collecting PI
Internet or other electronic network activity, such as your interaction with our websites and, if applicable, your interactions with your account(s).	• You	<ul style="list-style-type: none"> <li>• To service your accounts and provide financial products and services to you.</li> <li>• To market our financial products and services to you.</li> <li>• To analyze activity on and improve our website and online functionality.</li> <li>• To detect security incidents and fraud, and to analyze activity on our website.</li> </ul>
Geolocation data.	• You, when you use Wedbush.com and the Kluis Commodity Advisors Mobile App(s).	<ul style="list-style-type: none"> <li>• To provide you with financial products and services, to help you locate our offices, and to analyze traffic on our website.</li> <li>• To detect security incidents and fraud, and to analyze activity on our websites and Mobile App(s).</li> <li>• To support and develop Mobile Apps.</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 that we control.	• You	<ul style="list-style-type: none"> <li>• To service your accounts and provide financial products and services to you.</li> <li>• To detect security incidents and fraud.</li> </ul>
Professional or employment-related information.	<ul style="list-style-type: none"> <li>• You</li> <li>• Third parties, such as credit bureaus, affiliates, and other companies</li> </ul>	<ul style="list-style-type: none"> <li>• To service your accounts and provide financial products and services to you.</li> </ul>
Inferences drawn from any of the information that we collect about you.	<ul style="list-style-type: none"> <li>• You</li> <li>• Third parties, such as credit bureaus, affiliates, and other companies</li> </ul>	<ul style="list-style-type: none"> <li>• To service your accounts and provide financial products and services to you.</li> <li>• To market our financial products and services to you.</li> </ul>
Sensitive personal information, including your log-in and financial account number in	• You	<ul style="list-style-type: none"> <li>• To provide a better client experience and enhanced functionality.</li> </ul>

Categories of PI collected	Categories of sources from which we collect PI	Business or commercial purpose for collecting PI
combination with any security or access code or password allowing access to the account.		<ul style="list-style-type: none"> <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 Personal Information We Have Sold or Shared in the Last 12 Months.**

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 the commercial purpose of delivering our advertisements to you and 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