

PRIVACY POLICY

LAST UPDATED AND EFFECTIVE: May 7, 2024

I. What Our Privacy Policy Covers

At Valmark Financial Group (“Valmark”), our customers are our highest priority. As providers of financial products and services that involve the collection of personal – and often sensitive – information. This privacy policy covers Valmark’s consumer-facing operations in the United States, and applies to the personal information Valmark obtains in various contexts, both online and offline, including but not limited to: when you access or use this website, or any other services or applications operated by Valmark; visit our physical locations; communicate with our support representatives or other team members; engage with Valmark on social media; or participate in programs or events.

Valmark and its affiliated companies (“us,” “we,” or “our”) are comprised of Valmark Financial Group, LLC; Valmark Securities, Inc.; Valmark Advisers, Inc.; Executive Insurance Agency, Inc.; Valmark Policy Management Company, LLC; Long Road Risk Management Services, LLC; Long Road Risk Management Insurance Services, LLC; Valmark Advanced Markets, LLC; and Morehead Insurance Services, LLC.

We may provide additional or supplemental privacy policies in connection with specific activities or events.

If you are a California resident, the section below titled “Additional Information for California Residents” includes a description of your rights and our handling of your Personal Data.

Our website may link to other websites. Please note that we do not have control over the privacy practices of third-party websites or applications that we do not own.

II. What Personal Information We Collect

To better serve our clients, we collect various forms of personal information. Personal information is information that identifies, relates to, describes, or can be associated with you. Below is a list of the categories and forms of personal information that we collect.

Basic Identifying Information	Which may include your full name, alias, postal address, e-mail address, phone number, date of birth, account name, signature, username, social media handle, or other similar identifiers.
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Government-Issued Identifiers	Which may include your driver’s license number or other similar government identifier.
Device Information and Other Unique Identifiers	Which may include device identifier, internet protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifier, or similar unique identifiers.
Internet or Other Network Activity	Which may include your browsing or search history and information regarding your interactions with our websites, mobile applications, emails, or advertisements.
Geolocation Data	Which may include information that permits us to determine your location, such as if you manually provide location information or enable your mobile device to send us precise location information.
Payment and Financial Information	Which may include credit or debit card numbers, bank account numbers, account balances, trading activity, equity, compensation, loan numbers and amounts, account numbers, account history, income, debt, assets, revenue, credit history, credit score, investment experience, risk tolerance, and other information about investment objectives.
Commercial Information	Which may include products or services you have purchased, returned, exchanged, or considered; preferences; and rewards activity.
Physical Characteristics	Which may include hair color and type, eye color, height, weight, and other physical information you provide.
Biometric Information	Which may include a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. Biometric information may also be considered Sensitive Personal Information.

Health and Medical Information	Which may include information you choose to provide regarding medical conditions or medications.
Demographic Data	Which may include age, gender, race, ethnicity, estimated income, and household information, some of which may include characteristics of protected classifications under state or federal law.
User Content	Which may include your communications with us and any other content you provide (such as social media profiles, photographs, images, videos, survey responses, comments, product reviews, testimonials, and other content).
Audio, Visual, Thermal, and Olfactory Information	Which may include photographs, images, videos, recordings of your voice (such as when we record customer service calls for quality assurance), information regarding thermal settings, and information gathered from olfactory sensors.
Employment-Related Information	Which may include professional licenses and registrations, job history, performance, investigations, and offenses.
Education Information	Which may include education records, investigations, and offenses.
Inferences	Inferences drawn from or created based on any of the information identified above.
Sensitive Personal Information	Which may include depending on the state in which you reside: precise geolocation data, genetic data, biometric data, mental or physical health diagnosis, contents of communications, and information regarding protected classifications, as defined by state civil rights laws. Valmark only uses sensitive personal information as permitted by law and does not use it for inferring characteristics about you.

Personal Data does not include: publicly available information; de-identified or aggregated consumer information; or information excluded from the scope of California privacy law, such as health or medical information covered by the Health Information Portability and Accountability Act (HIPAA) or personal information covered by certain sector-specific privacy laws, such as the Fair Credit Reporting Act (FCRA).

Data that may have been collected from you or about you that has been sufficiently anonymized through aggregation with other data is not personal information for the purposes of this privacy policy.

III. How We Collect Your Personal Information

We collect your personal information from various sources, including but not limited to the following.

Directly from You

We collect personal information you provide, such as when you purchase a product or service; communicate and interact with one of Valmark's member offices, registered representatives, investment adviser representatives, or agents of a Valmark affiliate; register for an account or create a profile; respond to a survey; participate in promotions or campaigns; or sign up to receive emails, text messages, and/or mailings.

Using Online Tracking Technologies and Other Automatic Data Collection Technologies

When you visit our websites, open or click on emails we send you, or interact with our advertisements, we or third parties we work with automatically collect certain information using online tracking technologies such as pixels, web beacons, software developer kits, third-party libraries, and cookies. For more information, please see the "Cookies and Similar Online Tracking Technologies" section below.

Through In-Store and Other Offline Technologies

We may record customer service calls for quality assurance. Certain locations may use Closed Circuit Television or CCTV for safety, security, and operational purposes.

From Our Business Partners and Affiliates

We obtain information from businesses that we have partnered or affiliated with, including but not limited to Valmark members, Valmark's member offices, registered representatives, investment advisor representatives, affiliates, insurance specialty firms, wealth management firms, multidisciplinary CPA firms, individual broker-dealers, investment advisors, insurance agents, accountants, wealth managers, and other business professionals and individuals who use Valmark's services.

From Social Media Platforms and Networks

If you interact with us on social media or use features, such as plugins, widgets, or other tools made available by social media platforms or networks (including but not limited to Instagram, Facebook, Twitter, Google, YouTube, and LinkedIn) in connection with our websites or applications, we collect information that you disclose to us, or that the social

media platforms disclose to us. For more information about the privacy practices of those social media platforms, please review the privacy policies and settings of the social media platforms and networks that you use.

From Other Sources

For example, we may obtain information about you from other sources, such as data analytics providers, marketing or advertising service providers, vendors that provide services on our behalf, or publicly available sources. We may also create information based on our analysis of the information we have collected from you.

IV. Cookies and Similar Online Tracking Technologies

We and our third-party partners and service providers (such as advertising and analytics providers) use pixels, web beacons, software developer kits, third-party libraries, cookies, and other similar online tracking technologies (collectively, “online tracking technologies”) to gather information when you interact with our website, application, and email communications. Some online tracking technologies help us maintain the security of our websites and your account, prevent crashes, fix bugs, save your preferences, and assist with basic site functions.

We also permit third parties and service providers to use online tracking technologies on our website and application for analytics and advertising, including but not limited to helping manage and display advertisements and tailoring advertisements to your interests. The third parties and service providers use their technology to provide advertising about products and services tailored to your interests, which may appear either on our websites or on other websites.

We do not sell your private data. However, to the extent online tracking technologies are deemed to be a “sale” / “sharing” (which includes targeted advertising, as defined under the applicable laws) under applicable U.S. state laws, you can opt-out of these online tracking technologies by submitting a request via privacy@valmarkfg.com or calling 1-800-765-5201.

V. How We Use Your Personal Information

We collect and use personal information for various purposes, including but not limited to:

Providing Products and Services

We use your personal information to provide products and services, such as to fulfill your orders and/or complete the transactions you request; to process your payments; to provide you receipts and order updates; to send notifications to you related to your account; to create, maintain, and otherwise manage your account, profile, including offering functionalities such as the ability to save user preferences and transaction history.

Depending on the products and/or services you request, the categories of information used for these purposes may include Basic Identifying Information, Identifiers, Payment and Financial Information, and Commercial Information, Biometric Information, Government-Issued Identifiers, Health and Medical Information, User Content, Sensitive Personal Information.

Communicating With You

We use your personal information to communicate with you, such as to respond to and/or follow-up on your requests, inquiries, issues, or feedback, and to provide customer service.

Administering Valmark's Platforms and Programs

We use your personal information to administer our platforms and programs insurance products, broker-dealer services, investment advisory, web portals, financial planning, among others products and services. This may include setting up and verifying your account, communicating with you regarding the program, evaluating your application, and providing a forum for discussion, asking questions, posting photos and reviews, and sharing experiences.

Marketing and Promotional Purposes

We use personal information for marketing and promotional purposes, such as to send marketing, advertising, and promotional communications by email, or postal mail (such as trend alerts, promotions, new product launches, and event invitations); to show you advertisements for products and/or services tailored to your interests on social media and other websites; and to administer promotions.

Analytics and Personalization

We use personal information to conduct research and analytics, including to improve our services and product offerings; to understand how you interact with our websites, advertisements, and communications with you; to determine which of our products or services are the most popular; to improve our website and marketing campaigns; to personalize your experience; to save you time when you visit our website; to customize the marketing and advertising that we show you; to create a more personalized experience for you when you visit our stores; to provide services; to better understand our customers' needs; and to provide personalized recommendations about our products and services.

Legal Obligations

We use personal information to comply with our legal or regulatory obligations, monitoring and reporting relating to information security, due diligence, audit support, investigations, legal requests, and to establish or exercise our rights, and to defend against legal claims.

Core Business Functions

We use personal information to support core business functions, including to maintain records related to business process management; to collect amounts owed to us; and to

provide and maintain the functionality of our website, including identifying and repairing errors or problems.

Valmark retains your information only for as long as is required by applicable law or as necessary for the aforementioned functions. Your personal information will be deleted once Valmark has completed performing the aforementioned functions. Please note that in many situations we must retain all, or a portion, of your personal information to comply with our legal obligations; resolve disputes; enforce our agreements; protect against fraudulent, deceptive, or illegal activity; or for another one of our business purposes.

VI. How We Disclose Your Personal Information

Among other named situations, we disclose personal information in the following circumstances:

Corporate Affiliates

We may disclose personal information with our corporate affiliates. Such corporate affiliates process personal information on our behalf as our service providers, where necessary to provide a product or service that you have requested, or in other circumstances with your consent as permitted or required by law.

Service Providers

We disclose certain personal information to service providers that perform services to support our core business functions and internal operations including: fulfilling orders; complying with your requests or the provision of services by an intermediary; sending postal mail and e-mails; analyzing customer data; providing marketing assistance; administering our ratings and reviews; supporting beacons; processing financial transactions and payments; investigating fraudulent activity; conducting customer surveys; and providing customer service.

Business Partners

We may disclose your personal information with businesses that we have partnered with to jointly create and offer a product, service, or joint promotion or offering. If you decide to obtain a product or service that is offered by these partners, the information you provide will be disclosed to us and them. Their use of your information is not governed by this privacy policy but by their own respective privacy policies.

To Companies with which Valmark Has Selling Agreements

We will share your personal and financial information with other financial services entities, such as insurance companies and mutual fund companies, in order to effect transactions which you have requested, authorized, or contemplated. In such cases, those companies are prohibited by agreement from using information about you except for the narrow purpose for which it was given to them.

Social Media Platforms and Networks

Some of our websites have features such as, plugins, widgets, and/or other tools made available by social media platforms and networks that may result in information being collected or disclosed between us and such parties. Their use of your information is not governed by this privacy policy, but rather is governed by the terms of those third party's privacy policies.

Public Forums

Some of our websites provide the opportunity to post content in a public forum. If you decide to submit information in these public forums, that information will be publicly available.

Legal Process

We may disclose personal information in response to subpoenas, warrants, court orders, government inquiries, or investigations; or to comply with relevant laws and regulations. We may also disclose information to establish, exercise, or protect the rights of our company, employees, agents, and affiliates; to defend against a legal claim; and to take action regarding possible illegal activities or violations of our policies.

Transfer of Control

We may disclose personal information with another company that buys some, or all, of the assets or stock of Valmark, and that company may use and disclose personal information for purposes similar to what is described in this policy. Valmark may also disclose personal information with prospective purchasers to evaluate the proposed transaction.

Cross-Context Behavioral Advertising

We may disclose certain information for delivering targeted advertising to consumers based on personal information we may obtain from their activity across businesses, distinctly-branded websites, applications, or services, other than those with which they intentionally interact ("cross-context behavioral advertising"). We may disclose personal information to entities that perform marketing, advertising or market research on our behalf or help us determine the effectiveness of our marketing. The information we disclose for this purpose may include, Identifiers, Internet or similar network activity, Geolocation data and Inferences.

Other Instances

We may ask if you would like us to disclose your information with other third parties who are not described elsewhere in this privacy policy.

VII. How We Protect Your Personal Information

Personal information is maintained on our servers or those of our service providers, and is accessible by authorized employees, representatives, and agents as necessary for the purposes described in this privacy policy.

We maintain reasonable and appropriate physical, electronic, and procedural safeguards designed to help protect your personal information. While we attempt to protect your personal information in our possession, no method of transmission over the internet or security system is perfect, and we cannot promise that information about you will remain secure in all circumstances.

VIII. Your Rights

Managing Communication Preferences

Email

You can stop receiving promotional e-mails at any time by calling us toll free at 800-765-5201; notifying us through the Contact Us page of our website; emailing us at privacy@valmarkfg.com, sending us your instructions to Valmark Financial Group at 130 Springside Drive, Suite 300, Akron, Ohio 44333, or selecting the unsubscribe link at the bottom of marketing email communications you receive from us.

Removing Content from Public Forums

You can request that we remove content or information that you have posted on a public page on some of our websites by e-mailing details to Customer Service at privacy@valmarkfg.com. Please note that while we will endeavor to honor your request, our removal of your content or information does not ensure complete or comprehensive removal of that information from our website. For example, historical copies, or “caches,” may remain.

If you are a resident of California, Colorado, Connecticut, Utah, or Virginia, you have additional rights regarding how we use your personal information. Please see the section(s) below, naming your state, for additional rights afforded to you, per your state’s consumer data privacy act.

IX. Children’s Privacy

Our website is neither intended for nor directed to children under the age of 16. We do not knowingly collect personal information directly from children under the age of 16 without parental consent. If we become aware that a child under the age of 16 has provided us with personal information, we will delete the information from our records.

X. Communicating With Us

If you have any questions about our privacy or security practices, you can contact Valmark by mail, telephone, or e-mail:

Valmark Financial Group
130 Springside Drive, Suite 300
Akron, Ohio 44333
800-765-5201 (toll free)
privacy@valmarkfg.com

XI. Additional Information for California Residents

California law requires us to disclose the following information regarding our privacy practices.

California Shine the Light

Customers who are residents of California may request information concerning the categories of personal information (if any) we disclose to third parties or affiliates for their direct marketing purposes. If you would like more information, please submit a written request to us at this address:

Valmark Financial Group
130 Springside Drive, Suite 300
Akron, Ohio 44333
800-765-5201 (toll free)
privacy@valmarkfg.com

Categories of Personal Information We Collect and Our Purposes for Collection and Use

You can find a list of the categories of personal information that we collect in the “What Personal Information We Collect” section above. For details regarding the sources from which we obtain personal information, please see the “How We Collect Your Personal Information” section above. We collect and use personal information for the business or commercial purposes described in the “How We Use Your Personal Information” section above.

Categories of Recipients of Personal Information

We disclose personal information for business or commercial purposes to the categories of recipients listed below:

- **Individuals.** Your personal and financial information will be provided to those employees, registered representatives, agents, their assistants and those who process information or the transactions of Valmark in connection with the products or services being provided to you.
- **Among Valmark Affiliated Companies.** Valmark will share your personal and financial information among its affiliated companies, listed below, as needed, in connection with the products or services being provided to you.
- **To companies with which Valmark has selling agreements.** Valmark will share your personal and financial information with other financial services entities, such as insurance companies and mutual fund companies, in order to effect transactions, which you have requested or authorized. In such cases, those companies are prohibited, by agreement, from using information about you except for the narrow purpose for which it was given to them.

- Other companies as necessary to process your business. Your personal and financial information will be provided to third-party administrators and vendors utilized by Valmark to effect, administer or enforce a transaction that you requested or authorized. Valmark must share your personal information with its clearing firm in order to process that business. These companies, like those in the category above, are prohibited, by agreement, from using information about you except for the narrow purpose for which it was given to them.
- Other broker-dealers or investment advisers. If your advisor leaves Valmark and joins another brokerage and/or investment advisory firm, the nonpublic personal information collected by Valmark and your advisor may be provided to the new firm so your advisor can continue to service your account(s). If you do not want this information to be provided to the new firm, please opt out in accordance with the procedure outlined below. **States such as California, Vermont and others, require your affirmative consent before a financial advisor can provide your nonpublic information to a new firm. You can provide or withdraw this consent at any time by contacting 800-765-5201.**
- Where required by law or regulation. Valmark may be required by law or regulation to disclose your personal and/or financial information to a third party, for example, in response to a subpoena or to comply with industry rules and regulations.
- As otherwise authorized or permitted by law. For example, the law permits Valmark to respond to requests for information about you from a consumer-reporting agency.
- As authorized by you. Upon your direction or with your permission Valmark may share your information with a third party, other than as described in this notice.

For more information on how your information is disclosed, please see the “How We Share Your Personal Information” section, which provides more detail on our business partners, service providers and third parties. We may also need to disclose any of the above categories of information pursuant to Legal Process or as a result of a “Transfer of Control” as described in the “How We Share Your Personal Information” section. As stated in the “How We Use Your Personal Information” section above, we typically retain your personal information for the period necessary to fulfill the purposes outlined in this privacy policy, unless a longer retention period is required or permitted by law.

California Consumer Privacy Act (CCPA)

Under the CCPA, California residents have specific rights pertaining to the management and control of their personal information. Those rights are detailed below.

The Right to Opt Out of Cookies and Sale/Sharing Using Online Tracking Technologies

While we do not sell your personal data, our use of online tracking technologies may be considered a “sale” / “sharing” under applicable law. Visitors to our website can opt out of being tracked by these third parties by clicking the “Do Not Sell or Share My Personal Information” link at the bottom of our website and selecting the applicable preferences.

Your request to opt out of “sale” / “sharing” will be linked to your browser identifier only and not linked to any account information because the connection between your browser and the account is not known to us.

California residents may opt out by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC) (on the browsers and/or browser extensions that support such a signal). To download and use a browser supporting the GPC browser signal, click here: <https://globalprivacycontrol.org/orgs>. If you choose to use the GPC signal, you will need to turn it on for each supported browser or browser extension you use.

If you would like us to make the connection between your account and your opt-out of “sale” / “sharing” of your personal information request, we recommend you submit information by email to privacy@valmarkfg.com

When you email us regarding opting-out of the “sale” / “sharing” of your personal information, please provide the following information for each individual:

First name, middle initial and last name
Address, city, state and zip code
Telephone number (if applicable)

The Right to Limit the Use of Sensitive Personal Information

California residents have the right to limit the use and disclosure of sensitive personal information. Valmark uses or discloses sensitive personal information only to: (1) provide goods and services in line with your requests and expectations, (2) identify security incidents, (3) inhibit malicious, deceptive, fraudulent or illegal actions directed at Valmark or its affiliates, (3) ensure physical safety, (4) display short-term non-personalized advertising, (5) provide services like account maintenance or customer service, or (6) verify or maintain the quality and safety of products and services it offers. Valmark does not use sensitive personal information for inferring characteristics about you. California residents can limit the use of their sensitive personal information by clicking the “Do Not Sell or Share My Personal Information” link at the bottom of the website.

The Right to Accessing, Correcting, and Deleting Personal Information

You may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. If you are a

resident of California you have the rights to access, correct, and delete personal information. These rights may be limited in some circumstances by applicable law.

Access and Deletion

You can submit a request to access or delete your personal information, or withdraw consent, by:

- Emailing us at privacy@valmarkfg.com, or
- calling 800-765-5201 (**toll free**).

Corrections

You can correct information related to your account by:

- Emailing us at privacy@valmarkfg.com; or
- Calling 800-765-5201 (**toll free**).

You may submit a request for a copy of the information collected about you by emailing us at privacy@valmarkfg.com or calling 800-765-5201 (toll free). California residents may request personal information collected in at least the last 12-months and may do so up to twice per year per customer.

Responding to Requests

Once you have submitted your request, we will respond within the timeframe permitted by the applicable law. Please note that we may charge a reasonable fee for multiple requests in the same 12-month period, as permitted by law.

Identity Verification

For us to process some requests, we will need to verify your identity to confirm that the request came from you. We may contact you by phone or e-mail to verify your request. Depending on your request, we will ask for information such as your name, an e-mail address that you have used with Valmark or its affiliates, or a phone number you have used with Valmark or its affiliates. For certain requests, we may also ask you to provide details about recent transactions and a declaration under penalty of perjury to confirm your identity.

Authorized Agent

If you are a resident of California you may designate an authorized agent to submit a request on your behalf to access or delete your personal information. To do so, you must: (1) provide that authorized agent written and signed permission to submit such request; and (2) verify your own identity directly with us. Please note, we may deny a request from an authorized agent that does not submit proof that they have been authorized by you to act on your behalf.

XII. Changes to Privacy Policy

We may occasionally make changes to this Privacy Policy. If we wish to use your Personal Data for a new purpose not covered by this Privacy Policy, we will provide you with a new Privacy Policy explaining this new use prior to commencing the

processing of your Personal Data pursuant to the new Privacy Policy and setting out the relevant purposes and processing conditions by posting the new Privacy Policy to our website.

For more information about our privacy policy, you can call contact through our website or at:

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