



# PRIVACY POLICY

QUESTIONS? CALL (800) 696-8096

Willow Creek Wealth Management, Inc. (“Willow Creek”) is committed to safeguarding the use of the personal information of our clients (also referred to as “you” and “your”) that we may obtain while providing services to you as described here in our Privacy Policy (“Policy”). Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

## WHY DO YOU NEED TO KNOW WHAT WE DO WITH YOUR PERSONAL INFORMATION?

Financial companies such as Willow Creek are required to share some of your personal information while providing services to you or handling your account. Federal and State laws give you the right to limit some but not all sharing and require us to disclose to you how we collect, share, and protect your personal information.

## WHAT INFORMATION DO WE COLLECT FROM YOU?

The types of personal information we collect and share while you are a client depend on the products or services you have with us. The information can include:

- Social security or taxpayer identification number
- Name, address, and phone number(s)
- E-mail address(es)
- Account information (including other institutions)
- Assets and liabilities
- Income and expenses
- Investment activity
- Investment experience and goals

We collect the following types of information from and about all users of our website:

- Digital footprint
- IP address

## HOW DOES WILLOW CREEK COLLECT YOUR PERSONAL INFORMATION?

- Tell us about your investment or retirement portfolio
- Custody, brokerage, and advisory agreements
- Account applications and forms
- Other legal documents
- Investment questionnaires and suitability documents
- Seek financial or tax advice
- Transactional information with us or others
- Other information provided to service your account(s) and enhance your investment experience

## HOW DOES WILLOW CREEK PROTECT YOUR PERSONAL INFORMATION?

To protect your personal information from unauthorized access and use, we maintain physical, procedural, and electronic security measures. These measures include such safeguards as secure password policies, encrypted file storage, and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our employees are trained on their responsibilities to protect all personal client information. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

## HOW DOES WILLOW CREEK SHARE YOUR INFORMATION?

All financial companies need to share client personal information to effectively implement their services. In the section below, we list the reasons financial companies can share your personal information, the reasons we choose to share, and whether you can limit the sharing.

REASONS WE CAN SHARE YOUR INFORMATION	DO WE SHARE?	CAN YOU LIMIT?
<p><b>SERVICING OUR CLIENTS</b></p> <p>We may share non-public personal information with non-affiliated third parties (such as administrators, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.</p>	Yes	No
<p><b>THIRD PARTY MARKETING PURPOSES</b></p> <p>Willow Creek does not disclose, and does not intend to disclose, personal information with non-affiliated third parties or joint marketing with other financial companies to offer you services.</p>	No	Not Shared
<p><b>AUTHORIZED USERS</b></p> <p>Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).</p>	Yes	Yes
<p><b>FORMER CLIENT INFORMATION</b></p> <p>Willow Creek does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.</p>	No	Not Shared
<p><b>INFORMATION OBTAINED ON OUR WEBSITE</b></p> <p>We use Google Analytics (“GA”) for aggregated, anonymized website traffic analysis. Google drops a cookie with a randomly generated ClientID into your browser. This ID is anonymized and contains no Personal Identifiable Information (PII). It does include your IP Address. We use GA to track aggregated website behavior, such as what pages you visited, for how long, in what order, etc. We will not sell, give, or otherwise communicate any GA information gathered through our website to any third party for their own use or purposes. You may opt to refuse the use of cookies on our website. As well as request to delete any GA data by contacting us through our website <a href="http://willowcreekwealth.com/contact/">willowcreekwealth.com/contact/</a> or phone (800) 696-8096, and/or install the <a href="#">Google Analytics Opt-Out Browser Add-On</a>.</p>	No	Yes

### CAN YOU LIMIT OUR SHARING?

To the extent U.S. Federal laws apply to your personal information, you have the right to limit only:

- Sharing for affiliates’ everyday business purposes
- Affiliates from using your information to market to you
- Sharing for nonaffiliates to market to you

U.S. state laws and individual companies may give you additional rights to limit sharing. California state specific regulations require an affirmative opt-in before information can be shared with non-affiliated third parties; an opt-out for sharing amongst affiliates and self-addressed with pre-paid postage if there is not at least two free ways to respond (e.g. toll-free telephone or website).

## WHAT ARE YOUR RIGHTS?

To the extent permitted by the applicable law of your jurisdiction, in relation to your personal information, you may request:

- To have your personal information corrected, for example, if it is incomplete or incorrect
- To opt out of receiving marketing communications at any time
- The right to file a complaint with an applicable government regulator such as a Data Protection Authority

If you are located in the European Union, to the extent permitted by The European Union's GDPR, in relation to your personal information, you may request:

- To access the personal information held by us about you
- The right to restrict or object to the processing of your personal information, or request that your personal information is erased
- The right to receive a copy of the personal information which you have provided to our firm, in a structured, commonly used and machine-readable format (known as "data portability")
- Have a copy of the personal information we hold about you provided to you or another controller where technically feasible
- Where you have provided personal information voluntarily, or otherwise consented to its use, the right to withdraw your consent.
- To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to your information.

## DEFINITIONS

**AFFILIATES:** Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Willow Creek has no affiliates.

**NON-AFFILIATES:** Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- Willow Creek does not share with non-affiliates so they can market to you.

**JOINT MARKETING:** A formal agreement between non-affiliated financial companies that together market financial products or services to you.

- Willow Creek does not jointly market.