#### Attachment B

# **Privacy Notice**

This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information. This notice applies to all of your accounts and all documents or forms to which Raffa Wealth Management, LLC (RWM) has access containing your personal information.

### INFORMATION WE COLLECT

RWM must collect certain personally identifiable financial information about its customers to provide services including maintenance of your accounts, processing transactions, and providing advisory services described in our Form ADV. The personally identifiable financial information that we gather during the normal course of doing business with you may include:

- 1. information we receive from you on applications or other forms;
- 2. information about your transactions with us, our affiliates, or others;
- 3. information we develop as part of plans, analyses and reports delivered to you or used for our internal purposes;
- 4. information we receive from a consumer reporting agency.

## INFORMATION WE DISCLOSE

To administer, manage, service and provide related services for clients, it is necessary for RWM to provide access to client information within the firm and to non-affiliated companies with whom RWM has entered into agreements. To provide the utmost service, we will disclose information regarding clients and former clients, as necessary, to companies to perform certain services on RWM's behalf

However, we do not disclose any nonpublic personal information about our customers or former customers to nonaffiliated parties, except as permitted or required by law, or as necessary to provide services to you. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect to certain nonaffiliated third parties such as attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. In the event there were to be a change in this policy, RWM will provide you and all other clients with written notice and clients will be provided an opportunity to direct RWM as to whether such disclosure is permissible.

### **CONFIDENTIALITY AND SECURITY**

We are committed to safeguarding the confidential information of our clients. We hold all personal information provided by clients in the strictest confidence and it is the objective of RWM to protect the privacy of all clients. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information. Whenever applicable, RWM will require third party service providers to protect confidential client information by signing RWM's Confidentiality Agreement. RWM's Confidentiality Agreement with service providers will contain appropriate provisions to protect the security, confidentiality and integrity of all confidential information that is in their possession.

<sup>&</sup>lt;sup>1</sup>Nonpublic personal information means personally identifiable financial information and any list, description or other grouping of consumers that is derived using any personally identifiable financial information that is not publicly available.