2019 NOTICE REGARDING CLIENT PRIVACY

Maintaining the trust and confidence of our clients is one of our highest priorities. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Executive Wealth Management, LLC. Executive Wealth Management is a Registered Investment Advisor with the Securities and Exchange Commission (SEC) offering services to residents of the United States. Reference to registration does not imply any particular level of qualification or skill.

Information We Collect:

In connection with providing investment advice, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information we receive from you on our website, such as your name and email address, home address, telephone number, date of birth, occupation and employment status, education financial goals, assets and income;
- Billing and payment information received pursuant to providing our EWM 401(k) GPS service, including credit card information and billing address;
- Information that is collected automatically when you interact with our websites, services, and communications. It is standard for your web browser to automatically send information to every website you visit, including ours. That information includes your computer's IP address, access times, your browser type and language, and referring website addresses. We may also collect information about the type of operating system you use, your account activity, and files and pages accessed or used by you;
- We may also use certain kinds of technology such as cookies and web beacons to collect information. Among other things, the use of cookies and web beacons enables us to improve our websites and emails by seeing which areas and features are most popular, to count the number of computers accessing our website, to personalize and improve your experience, to record your preferences, and to allow you to visit our EWM 401(K) GPS website without re-entering your member ID and/or password. A cookie is a small amount of data which is sent to your browser from a website's computers and stored on your computer's hard drive. Most browsers automatically accept cookies as the default setting. You can modify your browser setting to reject our cookies or to prompt you before accepting a cookie by editing your browser options. However, if a browser is set not to accept cookies or if a user rejects a cookie, some portions of the website and services may not function properly. For example, you may not be able to sign in and access certain web page features or services. A web beacon is an electronic image, also called a "gif," that may be used on our web pages to deliver cookies, count visits and compile statistics on usage and campaign effectiveness or in our emails to tell if an email has been opened and acted upon;
- Information about your transactions with us, our affiliates, custodians or others; and
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.

Executive Wealth Management does not use information we collect to make any automated decisions through our services. We do not collect so called "special categories of personal data".

Categories of Information We Disclose:

We may disclose all information that we collect in accordance with the terms of this privacy policy. Executive Wealth Management and its affiliates do not sell customer lists containing personal information to unaffiliated third parties and will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose:

We disclose information regarding you or your account with us, only under the following circumstances:

- To your authorized Investment Advisor Representative and otherwise appropriate affiliated persons of Executive Wealth Management;
- To our parent companies or their affiliates as needed and to the extent permitted by law;
- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company;
- To consumer reporting agencies;
- To third parties who perform services or marketing on our behalf;
- By written authority, to your attorney, accountant or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law, to comply with regulatory inquiries or to defend our firm against charges of fraud or illegal activity.

Our definition of personal nonpublic information does not include "aggregate" data. Aggregate data is information we collect about a group or category of services or users from which individual user identities have been removed; no personally identifiable information is included in aggregate data. This privacy policy in no way restricts or limits our collection and use of aggregate data, and we may share aggregate data about our users with third parties for various purposes, including to help us better understand our customer needs and improve our services and for advertising and marketing purposes.

How We Use Information:

Subject to legal exceptions and provided we can authenticate your identity, you will be given reasonable access to your personal information and entitled to challenge accuracy and completeness of the information, amending as appropriate. Information may be used among our family of companies, their affiliates, and the companies that perform support services for us, such as data processors, technical systems consultants and programmers, or companies that help us provide products and services to you for a number of purposes, such as:

- To comply with Federal, State, and Self-Regulatory Organization requirements;
- To protect your personally identifiable information and accounts from unauthorized access or identity theft;
- To communicate with you about your use of our websites and services;
- To process your requests such as securities purchases and sales;
- To establish or maintain an account with an unaffiliated third party, such as a clearing broker-dealer providing services to you and/or Executive Wealth Management, LLC;
- To service your accounts, such as by issuing checks and account statements;
- To keep you informed about financial services of interest to you.
- To request feedback and to enable us to develop, customize and improve the website and our publications, products and services;
- For other purposes about which we notify you.

Our Security Policy:

We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard personal, nonpublic or confidential client information. While we take reasonable efforts to guard personal information we collect from you, including physical, electronic, and procedural security measures, no security system is impenetrable.

Secure Server Access to our EWM 401(K) GPS site is protected by the Secure Sockets Layer protocol which is the industry standard for secure data transfer software. SSL encrypts your personal information as it travels across the Internet.

You can tell if your browser is in secure mode by the icons that appear on the top or bottom bar of your browser. In most browsers, a secure connection is indicated by a closed or locked padlock. If the padlock is open, your connection is not secure. If it is closed, you can double-click on the padlock to get more information about the security of the site you are visiting.

Furthermore, each EWM 401K GPS user is issued a unique User ID to protect access to personal information. Please advise us immediately if you believe your password has been misused. Please note that we will never ask you to disclose your password in an unsolicited phone call or email.

Security Measures You Can Take:

We take reasonable measures to protect your physical and cyber stored personal information, but you also must play a role in ensuring that your personal information is secure and confidential. Here are five steps you can take to help us protect your information.

- Never tell anyone or otherwise share your account log in information.
- Use hard-to-guess passwords.
- Change online password frequently.
- Be sure to log off online accounts before leaving your computer, especially public computers.
- Always close your browser after accessing accounts online.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

Complaint Notification:

We at Executive Wealth Management strive to meet and exceed our clients expectations at all times. If there is ever a time when you are not satisfied with us, please direct complaints to:

Executive Wealth Management – Attn: Compliance
135 W. North Street, Suite 1
Brighton, MI 48116
Call: 810.229.6446
Email: kritsema@ewmadvisors.com

Changes to This Privacy Policy:

If we make any substantial changes in the way we use or disseminate confidential information, we will notify you.

If you have any questions concerning this Privacy Policy, please write to:

Executive Wealth Management, LLC
135 W. North Street
Brighton, MI 48116
Attn: Kyrstin Ritsema, CCO

or call us at 810.229.6446.