Bare Financial Services, Inc. Privacy Notice for California Residents

If you have any questions pertaining to this notice or if you wish to exercise your rights under California law, you can contact us at:

Phone: (717) 407-5200

Email: info@barewealthadvisors.com

Website: https://www.barewealthadvisors.com

This Privacy Notice for California Residents ("Notice") supplements the information contained in the general Privacy Policy of Bare Financial Services, Inc. doing business as Bare Wealth Advisors ("Bare Wealth Advisors," "Company," "we," or "us") (available on our website) and applies solely to those consumers who reside in the State of California ("consumers" or "you").

This Notice is intended to provide specific information to consumers in California and to describe your rights related to your Personal Information. We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), and its implementing regulations. Any terms defined in the CCPA/CPRA have the same meaning when used in this Notice.

This Notice does not cover Personal Information collected by Bare Wealth Advisors as part of an employee-employer relationship, including applicants and candidates for employment with Bare Wealth Advisors.

What is Personal Information?

Under the CCPA, "Personal Information" is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (Cal Civ. Code §1798.140 (v)). Personal Information includes, but is not limited to, the following: (a) identifiers, (b) select information in consumer records, (c) legally protected characteristics, (d) commercial purchasing information, (e) biometric information, (f) internet or network activity, (g) geolocation, (h) information typically detected by the senses, (i) employment information, (j) education information, (k) inferences from the above categories used to profile, or (l) sensitive Personal Information.

Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA/CPRA's scope, like:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; and
  - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994 (DPPA).

Information we collect

Bare Wealth Advisors does not "sell" Personal Information and has never "sold" Personal Information relating to you, including within the meaning of the CCPA. For purposes of this disclosure, "sell" or "sold" means the disclosure of Personal Information to a third party for monetary or other valuable consideration. We may collect, use, store, and transfer different kinds of Personal Information about you for business or commercial purposes depending on our relationship or interaction with you. We collect and use Personal Information generally for our business purposes, to provide the services for which you have inquired or purchased, and to be in legal compliance.

In particular, the Company has collected or disclosed the following categories of Personal Information about its consumers within the last 12 months:

Table 1: Types of Personal Information as defined in CCPA § 1798.140(O)(A-K)

Category	Examples	Collected and Purpose Collected	Sources of Personal Information	To whom we disclose Personal Information
A. Identifiers.	A real name, alias, first name, maiden name, last name, username, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES – Create, maintain, customize, and secure your account(s) Perform identity verification Process transactions Detect and prevent fraud Respond to court order and legal investigations Report to credit bureaus Market our products and services	Directly from our clients or their agents–e.g., from documents that our clients provide to us related to the services for which they engage us. Indirectly from our clients or their agents–e.g., through information we collect from our clients in the course of providing services and marketing to them. From third parties that interact with us in connection with the services we perform or products we provide–e.g., from outside companies we may use to assist us in providing you with our services or products.	Service providers performing necessary business functions Financial advisors registered with Bare Wealth Advisors and their client services associates Financial Product and Service Companies Law Enforcement, self-regulatory organizations, and regulators as required by law Service Providers (e.g., consultants, website developers, IT providers, auditors)

Category	Examples	Collected and Purpose Collected	Sources of Personal Information	To whom we disclose Personal Information
B. Protected classification characteristics under California or federal law.	Age (40 years or older), citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex.	YES – Create, maintain, customize, and secure your account(s) Perform identity verification Manage consumer relationship Market our products and services	Directly from our clients or their agents—e.g., from documents that our clients provide to us related to the services for which they engage us. Indirectly from our clients or their agents—e.g., through information we collect from our clients in the course of providing services and marketing to them. From third parties that interact with us in connection with the services we perform or products we provide—e.g., from outside companies we may use to assist us in providing you with our services or products.	Service providers performing necessary business functions Financial advisors registered with Bare Wealth Advisors and their client services associates Financial Product and Service Companies Law Enforcement, self-regulatory organizations, and regulators as required by law
C. Commerci al information.	Records of products or services purchased, or considered, other purchasing or consuming	YES – Create, maintain, customize, and secure your account(s) Process transactions	Directly from our clients or their agents—e.g., from documents that our clients provide to us related to the services for	Service providers performing necessary business functions Financial advisors registered with Bare Wealth Advisors and their

Category	Examples	Collected and Purpose Collected	Sources of Personal Information	To whom we disclose Personal Information
	histories or tendencies.	Detect and prevent fraud Respond to court order and legal investigations Market our products and services	which they engage us. Indirectly from our clients or their agents—e.g., through information we collect from our clients in the course of providing services and marketing to them. From third parties that interact with us in connection with the services we perform or products we provide—e.g., from outside companies we may use to assist us in providing you with our services or products.	client services associates Financial Product and Service Companies Law Enforcement, self-regulatory organizations, and regulators as required by law
D. Biometric information.	Genetic, physiological, behavioral, and biological characteristics.	NO	Not Applicable	Not Applicable
E. Internet or other similar electronic network activity.	Information regarding a consumer's interaction with an internet website, application, or advertisement.	YES – Risk and security control and monitoring Detect and prevent fraud Support, personalize and develop our website and online	Directly from our clients or their agents—e.g., from documents that our clients provide to us related to the services for which they engage us. Indirectly from our clients or	Service providers performing necessary business functions Financial advisors registered with Bare Wealth Advisors and their client services associates

Category	Examples	Collected and Purpose Collected	Sources of Personal Information	To whom we disclose Personal Information
		products and services Respond to court order and legal investigations Market our products and services	their agents—e.g., through information we collect from our clients in the course of providing services and marketing to them. From third parties that interact with us in connection with the services we perform or products we provide—e.g., from outside companies we may use to assist us in providing you with our services or products.	Law Enforcement, self-regulatory organizations, and regulators as required by law
F. Geolocatio n data.	Physical location or movements.	YES – Risk and security control and monitoring Detect and prevent fraud	Directly from our clients or their agents—e.g., from documents that our clients provide to us related to the services for which they engage us. Indirectly from our clients or their agents—e.g., through information we collect from our clients in the course of providing services and marketing to them.	Service providers performing necessary business functions Law Enforcement, self-regulatory organizations, and regulators as required by law

Category	Examples	Collected and Purpose Collected	Sources of Personal Information	To whom we disclose Personal Information
			Directly and indirectly from activity on our website or third-party websites through which we advertise—e.g., from submissions through our website portal or website usage details collected automatically.	
G. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO	Not Applicable	Not Applicable
H. Professional or employment-related information.	Current or past job/work history or performance evaluations.	YES – Create, maintain, and customize your account(s) Manage consumer relationship	Directly from our clients or their agents—e.g., from documents that our clients provide to us related to the services for which they engage us. Indirectly from our clients or their agents—e.g., through information we collect from our clients in the course of providing services and marketing to them.	Service providers performing necessary business functions Financial advisors registered with Bare Wealth Advisors and their client services associates Financial Product and Service Companies Law Enforcement, self-regulatory organizations, and regulators as required by law
I. Education information	Education records directly related to a student, school	NO	Not Applicable	Not Applicable

Category	Examples	Collected and Purpose Collected	Sources of Personal Information	To whom we disclose Personal Information
	or schools, graduation date			
J. Inferences drawn from other Personal Information.	Drawn from any of the information identified in this table to create a profile about a consumer reflecting the consumer's preferences	YES – Create, maintain, and customize your account(s) Manage consumer relationship Market our products and services	Indirectly from our clients or their agents–e.g., through information we collect from our clients in the course of providing services and marketing to them. From third parties that interact with us in connection with the services we perform or products we provide–e.g., from outside companies we may use to assist us in providing you with our services or products.	Service providers performing necessary business functions Financial advisors registered with Bare Wealth Advisors and their client services associates Financial Product and Service Companies Law Enforcement, self-regulatory organizations, and regulators as required by law
K. Sensitive Personal Information	Identifiers such as social security number or driver's license number; a unique account number or account log-in in combination with any required security or access code, password, or credentials allowing access to an account;	YES – Create, maintain, customize, and secure your account(s) Process transactions Detect and prevent fraud Respond to court order and legal investigations	Directly from our clients or their agents–e.g., from documents that our clients provide to us related to the services for which they engage us. Indirectly from our clients or their agents–e.g., through information we collect from our	Service providers performing necessary business functions Financial advisors registered with Bare Wealth Advisors and their client services associates Financial Product and Service Companies Law Enforcement, self-regulatory

Category	Examples	Collected and Purpose Collected	Sources of Personal Information	To whom we disclose Personal Information
	geolocation data; and certain characteristics such as racial or ethnic origin and religion	Risk and security control and monitoring Support, personalize and develop our website and online products and services	clients in the course of providing services and marketing to them. From third parties that interact with us in connection with the services we perform or products we provide—e.g., from outside companies we may use to assist us in providing you with our services or products.	organizations, and regulators as required by law

Use and Collection of Personal Information

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

We do not process sensitive personal information beyond what is reasonably necessary to provide our products and services and the purposes described above. We may rely on service providers to assist us with these efforts.

The Company only collects or processes your sensitive Personal Information for the purposes expressly permitted by the CCPA/CPRA and its implementing regulations. The Company does not collect or process sensitive Personal Information for the purpose of inferring characteristics about you.

Sources of Personal Information

The Company obtains the categories of Personal Information listed above from the following categories of sources which are described more fully in our Privacy Notice:

- Directly from you, for example, information you provide via a form on our website or when creating a user account in one of our technology solutions.
- Indirectly from you, for example, from logging your actions in our technology solutions or through cookies stored in your browser and similar technologies.
- From our Service Providers, for example information obtained through IT service providers or marketing consultants.

- From courts or government agencies, for example information received regarding a court subpoena.

Disclosure of Personal Information

The Company may disclose your Personal Information to external parties for a business purpose. When we disclose Personal Information for a business purpose to a Service Provider or Contractor, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

We also may disclose your Personal Information to other third parties when required by law or to meet a legal or compliance obligation.

We disclose your Personal Information to the following categories of external parties:

- Service providers who are providing a service for, or on behalf of, the Company such as information technology partners, contractors provided by staffing agencies, auditors, accountants, marketing consultants.
- In the case of customer reference data, testimonials or other customer stories related to our solutions, to other customers or prospective customers, but only with prior consent from you.
- Relevant third parties in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- As required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, meet a compliance obligation or respond to government requests, including public and government authorities outside your country of residence, for national security or law enforcement purposes.

Sale or Sharing of Personal Information

Bare Wealth Advisors does not sell Personal Information in exchange for any monetary consideration.

Bare Wealth Advisors shares your Personal Information with third parties and service providers when necessary for business purposes. When Bare Wealth Advisors shares your Personal Information, it is contractually protected by both Bare Wealth Advisors and the applicable third party or service provider in question.

The categories of Personal Information we may share may include the categories listed in Table 1 above.

The categories of third parties we may share your Personal Information with include: service providers performing necessary business functions, financial advisors registered with Bare Wealth Advisors and their client services associates, financial product and service companies and law enforcement, self-regulatory organizations, and regulators as required by law.

Our products and services are not directed at, marketed to, nor intended for, children under 18 years of age. We do not knowingly collect any Personal Information directly from children under the age of 18. If you have reason to believe that someone under the age of 18 has provided Personal Information to Bare Wealth Advisors, please contact us and we will take appropriate action.

Retention of Personal Information

We will not retain Personal Information longer than necessary to fulfill the purposes for which it is processed, including the security of our processing, complying with legal and regulatory obligations (e.g. audit, accounting, and statutory retention terms), handling disputes, and for the establishment, exercise, or defense of legal claims.

Your Rights

The CCPA, as amended by the CPRA, provides consumers (California residents) with specific rights regarding their Personal Information. This section describes your rights and explains how to exercise those rights. We do not process sensitive Personal Information beyond what is reasonably necessary to provide our products and services and the purposes described above. We may rely on service providers to assist us with these efforts.

<u>Sharing</u>

You have the right to opt out of having your personal information shared for cross-context behavioral advertising.

<u>Disclosure</u>

You have the right to ask us to disclose to you any Personal Information we have collected about you in the last 12 months (CCPA 1788.100). In order to exercise this right, Bare Wealth Advisors must first verify your identity to ensure it is a legitimate request, and then disclose to you:

- The categories of Personal Information we collected about you.
- The types of sources used to collect Personal Information about you.
- The business or commercial purpose(s) for collecting your Personal Information.
- The types of third parties with which we have shared any of your Personal Information (if applicable).
- The specific pieces of Personal Information we collected about you (also called a data portability request).
- The categories of Personal Information that have been disclosed for a business purpose that each category of recipient obtained.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. Your request for access or data portability will apply to Personal Information collected on or after January 1, 2022, that is still maintained by the Company at the time of the request. You may specify a shorter time-period for your request at your option.

<u>Correction</u>

You have the right to ask us to correct Personal Information that we have collected about you. In order to exercise this right, Bare Wealth Advisors must first verify your identity to ensure it is a legitimate request.

<u>Deletion</u>

You have the right to request that we delete the Personal Information we have collected from and about you. In order to exercise this right, Bare Wealth Advisors must first verify your identity to ensure it is a legitimate request, we will then delete or de-identify the relevant information unless an exemption applies (CCPA 1798.105).

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

To exercise the access, correction, data portability, or deletion rights described above please submit a verifiable consumer request via the phone number or email address below in the "Contact Information" section of this notice.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to your Personal Information. If an authorized agent submits a request on your behalf, you may be asked to verify your identity directly with Bare Wealth Advisors. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response using the contact information we have on file for that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination/Non-Retaliation

You have the right to be free from unlawful discrimination for exercising your rights under the CCPA (CCPA §1798.125). You have the right to exercise your rights without retaliation. We will not discriminate against you for exercising any of your CCPA/CPRA rights.

If you feel that you have experienced discrimination or retaliation, you are encouraged to call Bare Wealth Advisors at (205) 982-5555.

California Shine the Light

California's "Shine the Light" law (Civil Code Section § 1798.83) permits California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, submit your request to info@barewealthadvisors.com . Please allow 30 days for a response. Please note that "Shine the Light" rights and CCPA/CPRA rights are granted by different laws and must be exercised separately.

Changes to Our Privacy Notice

We reserve the right to amend this Notice at our discretion and at any time. The most up-to-date version can always be found on our website, and updates will be reflected by the Last Updated date at the top of this Notice.

Contact Information

If you have any questions or comments about this Notice, the ways in which the Company collects and uses your information described in this Notice, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at info@barewealthadvisors.com or (717) 407-5200.

When you contact us, please provide the following:

- Type of request (access, correction, data portability, or deletion)
- Your relationship to Bare Wealth Advisors (client, prospect)
- Your state of residency
- Preferred method of contact (email or phone)
- Whether you are submitting the request for yourself or on behalf of someone else