

# Chagrin Valley Legacy Advisors Privacy Policy

---

Effective: February 2026

## Our Commitment to Your Privacy

Chagrin Valley Legacy Advisors ("the Adviser," "we," "us," or "our") is committed to safeguarding the personal information you entrust to us as your investment adviser. We maintain strict policies and procedures designed to keep your information secure, confidential, and used only for legitimate business purposes in connection with servicing your accounts. We do not sell your personal information or share it with non-affiliated third parties for their marketing purposes.

## Information We Collect From You

We collect personal information necessary to open, maintain, and service your accounts. This may include:

<b>Information You Provide</b>	<b>Financial &amp; Account Information</b>
Name, address, phone numbers	Assets, liabilities, income, expenses
Email addresses	Investment activity and transaction history
Date of birth	Investment experience, goals, risk tolerance
Driver's license or government ID	Account information from other institutions
Social Security or taxpayer ID number	Beneficiary and trusted contact information

## Information We Collect From Other Sources

We may also obtain information from:

<b>External Sources</b>	<b>Purpose</b>
Custodial, brokerage, and advisory agreements	To establish and maintain accounts
Account applications and onboarding forms	To verify identity and suitability
Legal and advisory documents	To comply with regulatory requirements
Transactional data from custodians or brokers	To manage and monitor investments
Third-party service providers	To support account servicing and reporting

## How We Protect Your Information

We maintain physical, electronic, and procedural safeguards to protect your personal information from unauthorized access, disclosure, alteration, or destruction. These include secure office facilities, encrypted data storage, password-protected systems, multi-factor authentication, vendor due diligence, and employee training.

## How We Share Your Information

We share personal information only as permitted by law and only for legitimate business purposes.

<b>Basis for Sharing</b>	<b>Do We Share?</b>	<b>Can You Limit?</b>
Servicing Your Accounts	Yes	No
Marketing Purposes	No	Not Shared
Affiliates' Everyday Business Purposes	No	Not Shared
Authorized Users	Yes	Yes
Former Clients	No	Not Shared

## Privacy Considerations

We comply with Ohio Revised Code 1349, Ohio data breach notification requirements, and Ohio consumer protection standards. We implement reasonable administrative, technical, and physical safeguards to protect personal information, including Social Security numbers, driver's license numbers, and financial account information.

## Recording of Communications

Our phone lines and video conferencing systems may have the capability to record. Recordings are treated as confidential information and protected under this Privacy Policy.

## Changes to This Privacy Policy

We will provide you with a copy of this Privacy Policy annually for as long as you maintain a relationship with us. If we make material changes, we will notify you before implementing them.

## Questions or Concerns

If you have questions about this Privacy Policy or wish to request a current copy, please contact us:

Chagrin Valley Legacy Advisors  
25800 Science Park Dr # 150, Beachwood, OH 44122  
Phone: (440) 305-0733  
Email: [reception@chagrinvalleylegacy.com](mailto:reception@chagrinvalleylegacy.com)