# CALIFORNIA PRIVACY POLICY

California residents have additional rights over their personal information ("PI") that is not already protected by existing federal privacy laws. This California Privacy Policy describes the personal information that Wedbush Financial Services, LLC; Wedbush Securities Inc.; Wedbush Asset Management Capital, LLC; Wedbush Asset Management, LLC; Wedbush Capital Management, LLC; Wedbush Capital; Wedbush Futures; Wedbush Securities Advanced Clearing Services and Kluis Commodity Advisors (collectively, “Wedbush,” “we,” “us,” and “our”) collect about you, the rights you have with respect to that information, and how you can exercise those rights. This information supplements the information contained in our Privacy Notice.

**Right to Know.**
You have the right to request that we disclose what personal information we collect, use, disclose and sell. (Wedbush has not sold and does not sell your personal information.)

**Categories of personal information we have collected about you in the last 12 months, why we have collected it, and whether we have disclosed that information for a business purpose.**

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<tr>
<th>CATEGORIES OF PI COLLECTED IN THE PAST 12 MONTHS</th>
<th>CATEGORIES OF SOURCES FROM WHICH WE COLLECT PI</th>
<th>BUSINESS OR COMMERCIAL PURPOSE FOR COLLECTING THE PI</th>
<th>PI DISCLOSED FOR A BUSINESS PURPOSE?</th>
<th>CATEGORIES OF THIRD PARTIES TO WHOM WE DISCLOSE PI FOR A BUSINESS PURPOSE</th>
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| Identifiers, such as your name, address, Internet Protocol (IP) address, unique personal identifier (device identifier), e-mail address, account name, social security number, driver’s license number, passport number, telephone number(s) and signature. | • From you, when you open an account with us, visit our website, request information, or join our mailing list.  
• From third parties, such as credit bureaus, affiliates, and other companies. | • To maintain and service your accounts and to provide financial products and services to you.  
• To comply with legal requirements.  
• To respond to your requests, manage relationships.  
• To market financial products and services to you.  
• To detect fraud and security incidents and analyze activity on our websites. | Yes | • Service providers with whom we have contracts to provide services to us, such as effecting transactions on your behalf; maintaining and servicing your accounts; marketing our products and services; managing our client relationships; analyzing activity on our website; maintaining the security confidentiality and integrity of our systems and detecting fraud.  
• If your financial advisor has left Wedbush and joined a different firm with which Wedbush has entered into an agreement regarding financial advisors changing firms, Wedbush permitted your financial advisor to take certain limited information—your name, address, e-mail address, phone number, and account title—to solicit you to join the new firm (unless you have limited this sharing).  
• Financial institutions with which we have written agreements to jointly market financial products and services to our clients. |
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| Additional personal information such as age, citizenship, marital status, medical condition, physical or mental disability, gender. | • From you, when you open and maintain accounts with us, and provide this information to us.  
• From third parties, such as credit bureaus, affiliates, and other companies. | • To maintain and service your accounts and provide financial products and services to you.  
• To respond to your requests, manage relationships.  
• To market financial products and services to you. | Yes | • Service providers.  
• Financial institutions with which we have written agreements to jointly market financial products and services to our clients. |
| Commercial information, such as records of products or services purchased or considered. | • From you, when you open and maintain accounts with us, provide information to us, seek financial advice or buy or sell securities.  
• From third parties, such as credit bureaus, affiliates, and other companies. | • To maintain and service your accounts and provide financial products and services to you.  
• To respond to your requests, manage relationships.  
• To market financial products and services to you. | Yes | • Service providers.  
• Financial institutions with which we have written agreements to jointly market financial products and services to our clients. |
| Internet or other electronic network activity, such as your interaction with our websites and, if applicable, your interactions with your account(s). | • From you, when you visit our website(s) and when you log into your account(s).  
• From our service providers who monitor our websites and electronic account activity. | • To provide financial products and services to you.  
• To detect fraud and security incidents and analyze activity on our websites.  
• To improve our website.  
• To market financial products and services to you. | Yes | • Service providers. |
| Geolocation data. | • From your device, when you use the Kluis Commodity Advisors Mobile App(s). | • To provide financial products and services to you.  
• To detect security incidents and analyze activity on our websites and Mobile App(s).  
• To detect and prevent fraud.  
• To support and develop our Mobile Apps.  
• To market financial products and services to you. | Yes | • Service providers. |
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| Audio, electronic and visual information, such as voice recordings when you call us on a recorded line, or your photograph if you visit a location with security cameras. | • From you, such as when you call us on a recorded line, or when you visit a location with security cameras.  
• From our service providers who assist us with customer service and security. | • To provide financial products and services to you.  
• To provide customer service and maintain accounts.  
• To detect fraud and security incidents, and to prosecute those responsible.  
• To maintain the security of our premises. | Yes | • Service providers. |
| Professional or employment-related data, such as your work history and income. | • From you, when you open and maintain accounts with us, and when you provide this information to us.  
• From third parties, such as credit bureaus, affiliates, and other companies. | • To provide financial products and services to you.  
• To maintain and service your account(s).  
• To market financial products and services to you. | Yes | • Service providers.  
• Financial institutions with which we have written agreements to jointly market financial products and services to our clients. |
| Inferences drawn from any of the information that we collect about you to create a profile about you and your preferences. | • From you, when you open and maintain accounts with us, and when you provide this information to us, visit our website, sign up for our newsletters or respond to our surveys.  
• From third parties, such as credit bureaus, affiliates, and other companies. | • To provide financial products and services to you.  
• To maintain and service your account(s).  
• To market financial products and services to you. | Yes | • Service providers.  
• Financial institutions with which we have written agreements to jointly market financial products and services to our clients. |

Additional source from which we obtain your personal information.

We also obtain contact details and other personal information regarding media contacts and influencers from a variety of sources including Cision. If you wish to know more about how such information is collected and used, please refer to Cision’s privacy notice at www.cision.com/us/legal/privacy-policy/.

Right to Request Deletion of Personal Information.

You have the right to request that we delete your personal information.

Instructions for Submitting a Request to Know or a Request to Delete.

To submit a request to know what personal information we have collected about you, or a request that we delete your personal information, call us (toll-free) at (800) 834-2153 or by contacting us by e-mail at privacy@wedbush.com.

We will verify your identity. If you submit a request to know or delete personal information, we will verify your identity. We will match pieces of personal information provided by you with personal information maintained by us that we have determined are reliable. We may also require that you submit a signed declaration under penalty of perjury stating that you are the individual whose personal information is the subject of the request.

In some instances there is no reasonable method by which we can verify your identity. This is the case, for example, when you visit
our website. In that circumstance, we collect your Internet Protocol address and information about your activity on our website, but we do not associate this information with any named actual person or account.

**You may designate an authorized agent to submit a request on your behalf.** You have the right to authorize another person to submit a request to know your personal information or to delete your personal information. To have another person submit a request on your behalf, call us (toll-free) at (800) 834-2153 or by contacting us by e-mail at privacy@wedbush.com and tell us that you would like to authorize another person to submit a request to know or delete on your behalf. You will need to provide us with written permission authorizing the other person to submit a request to know or delete on your behalf. We will give you instructions on how to send the written authorization to us. We will still verify your identity and will verify that you have given your authority to another person.

**Right to Opt Out of the Sale of Your Personal Information.**

Where a business sells your personal information, you have the right to opt-out of the sale of that information. Wedbush has not sold and does not sell your personal information. Wedbush does not have actual knowledge that it sells the personal information of minors under 16 years of age.

**Right to Non-Discrimination for the Exercise of a Consumer’s Privacy Right.**

You have the right not to receive discriminatory treatment by us because you have exercised your privacy rights. This means that you have the right not to be denied goods or services, or charged different prices, just because you have exercised your privacy rights.

**Contact for more information.**

If you have questions or concerns about our privacy policies and practices, you may call us (toll-free) at (800) 834-2153 or by contacting us by e-mail at privacy@wedbush.com.

**Date Privacy Policy was last updated.**

November 18, 2020.