WILLIAMS JONES WEALTH MANAGEMENT, LLC

CALIFORNIA CONSUMER PRIVACY NOTICE

FOR CALIFORNIA RESIDENTS

Effective Date: September 2026 | Last Reviewed: September 2026

We provide this privacy notice ("Notice") to comply with the California Consumer Privacy Act of 2018 ("CCPA", as amended by the California Privacy Rights Act of 2020, collectively referred to as the "CCPA"). References to the CCPA in this Notice include the California Privacy Rights Act amendments and implementing regulations adopted by the California Privacy Protection Agency (CPPA). This Notice applies to California residents ("California residents" or "you") who engage with us in connection with obtaining or seeking to obtain our service (collective, the “Services"). It supplements the privacy policies of Williams Jones Wealth Management, LLC ("WJWM", "we" or "the Firm").

This Notice describes how we collect, use, and disclose 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 ("**Personal Information**"). Personal Information does not include aggregate or de-identified information or publicly available information from government records.

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YOUR CCPA RIGHTS

If you are a California resident, you have the rights related to your Personal Information including: (1) to request more information about the categories and specific pieces of Personal Information we have collected and disclosed for a business purpose, (2) to request deletion of your Personal Information, (3) to request correction of inaccurate Personal Information, (4) to opt out of the sale or sharing of your Personal Information, (5) to limit our use and disclosure of your Sensitive Personal Information, and (6) to not be discriminated against for exercising these rights. You may make these requests by calling 212-935-8750 or visiting this page.

https://www.williamsjones.com/ccpa

We will verify your request by matching information you have previously provided to us to information you provide as part of your request. You have the right to request that an agent submit a request to exercise your rights on your behalf. We require that your agent provides a signed, written permission from you authorizing your agent to act on your behalf (or a valid power of attorney pursuant to Probate Code §§ 4000-4465), and we may verify the consumer's own identity directly. We reserve the right to contact you directly if we have any questions or concerns about the agent's submission.

WJWM does not sell or share your Personal Information as those terms are defined under the CCPA.

Information about how to exercise your rights is provided below. The CCPA includes exceptions and exemptions that will limit your ability to exercise your CCPA rights for certain types of Personal Information. We will not discriminate against you if you exercise your rights under the CCPA.

RIGHT TO KNOW

Under the CCPA, you have the right to request more information about the Personal Information we have collected about you and what categories of Personal Information we have shared with unaffiliated third parties.

Collection of Personal Information

- **Information You Provide to Us:** We collect information you provide directly to us. For example, we collect information when you request information related to our investment advisory or wealth management services, fill out a form, engage the Firm, provide information so that we can provide wealth management or investment advisory services or you otherwise communicate with us. The types of information we may collect include your name, date of birth, email address, postal address, phone number, financial account details, government-issued identifiers, and any other information you choose to provide such as net worth, employment or educationally-related details.
- **Other Information We Collect When You Use our Services:** When you access or use our Services or transact business with us, we automatically collect information about you, including:
    - **Usage Information:** We collect information about your use of the Services, such as when you access our client portal or open communications we send to you.
    - **Transactional Information about our Engagement:** When you engage us, we collect information about the terms of our Services, our fees and your expectations.

- **Information Collected by Cookies and Similar Tracking Technologies:** We (and our service providers) use different technologies to collect information, including cookies. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular, and count visits.
- **Information We Collect from Other Sources:** We may also obtain information about you from other sources. For example, we may collect information about you from third parties, including but not limited to account custodians, from your third-party advisers such as accountants and lawyers, and from publicly available sources.
- **Information We Derive:** We may derive information or draw inferences from you based on the information we or our partners collect. For example, we may make inferences about your preferences, financial products and services that may interest you, and your investing patterns and behaviors.

Use of Information

We use the information we collect:

- To provide the investment advisory services you have requested;
- To protect the security and integrity of our systems, networks, applications, and data, including detecting, analyzing, and resolving security threats, and collaborating with cybersecurity centers, consortia, and law enforcement about imminent threats;
- To enforce our contracts and to protect against injury, theft, legal liability, fraud, or abuse, and to protect people or property, including physical security programs;
- To de-identify Personal Information or create aggregated datasets, such as for consolidating reporting;
- For identity and credential management, including identity verification and authentication and system and technology administration;
- For fraud detection and prevention;
- For legal and regulatory compliance, including all uses and disclosures of Personal Information required by law or reasonably needed for compliance with our policies and procedures, such as: client identification, fiduciary and suitability requirements, portfolio management, security and incident response programs;
- For corporate audit, analysis, and reporting;
- For business continuity and disaster recovery purposes; and
- For corporate governance, including mergers, acquisitions, and divestitures.

Sharing of Information

We may share information about you as follows or as otherwise described in this Notice:

- With vendors, service providers, contractors, and professional advisors that perform services for us, including accountants, tax planners, and attorneys;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;

- If we believe your actions are inconsistent with our user agreements or policies, if we believe you have violated the law, or to protect the rights, property and safety of the Firm or others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among the Firm and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and
- With your consent or at your direction.

We may also share aggregated or de-identified information that cannot reasonably be used by those third parties to identify you.

RIGHT TO ACCESS SPECIFIC INFORMATION AND DATA PORTABILITY

Under the CCPA, you have the right to request that we disclose the following to you:

- The categories of Personal Information we collected about you.
- The specific pieces of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- The business or commercial purpose for collecting that Personal Information.
- The categories of third parties with whom we share that Personal Information.

Once we receive and confirm your verifiable access request, we will disclose the requested information covering the applicable period (which may exceed 12 months for Personal Information collected on or after January 1, 2022, unless we determine that providing such information proves impossible or would involve a disproportionate effort, in which case we will explain the basis for that determination), unless an exception applies.

RIGHT TO CORRECT

Under the CCPA, you have the right to request that we correct inaccurate Personal Information that we maintain about you, taking into account the nature of the Personal Information and the purposes of processing. Upon receiving and confirming a verifiable consumer request to correct, we will use commercially reasonable efforts to correct the inaccurate Personal Information as directed by you. We may require you to provide documentation supporting the correction if it is reasonable and proportionate to do so. We will also instruct our service providers and contractors that maintain your Personal Information on our behalf to make the corresponding correction in their records.

RIGHT TO DELETE

Under the CCPA, you have the right to request that we delete your Personal Information. Once we receive and confirm your verifiable deletion request, we will delete or de-identify (and direct our service providers and contractors to delete or de-identify) your Personal Information from our records unless an exception applies or retaining your Personal Information is necessary for us or our service providers and contractors to:

- Comply with a legal or regulatory obligation.

- 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 software to identify and repair errors that impair existing intended functionality.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.).
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Upon confirming a deletion request, we will also notify all third parties to whom we have sold or shared your Personal Information (if applicable) to delete the consumer's Personal Information, unless this proves impossible or involves disproportionate effort.

SENSITIVE PERSONAL INFORMATION

The CCPA identifies certain categories of Personal Information as Sensitive Personal Information (SPI). In connection with our investment advisory and wealth management services, we collect and process the following categories of SPI:

- Social Security number or other taxpayer identification number;
- Passport number;
- Financial account number in combination with any required security or access code, password, or credentials allowing access to an account;
- Account log-in credentials (username in combination with a password or security question and answer that would permit access to an account); and
- A child's Social Security number or other taxpayer identification number (collected from parents/authorized adults only).

We use Sensitive Personal Information for the following purposes:

- To provide the investment advisory and wealth management services you have requested, including establishing and maintaining accounts, processing transactions, and verifying your identity;
- To comply with federal and state legal and regulatory obligations (including SEC, FINRA, anti-money laundering, and tax reporting requirements);
- For security and fraud prevention purposes, including authenticating you and protecting against unauthorized transactions;
- To perform services on behalf of the business, including account servicing and maintenance, transaction processing, and recordkeeping; and
- For other purposes that do not constitute inferring characteristics about a consumer.

We use Sensitive Personal Information only for the purposes identified above, which are either (a) necessary to perform the services reasonably expected by an average consumer who requests such services, or (b) permitted purposes under Cal. Civ. Code § 1798.121(a) and CPPA Regulations § 7027(l). Because we use SPI solely for these permitted purposes, consumers do not have the right to limit our use and disclosure of SPI beyond these purposes.

HOW TO EXERCISE YOUR CCPA RIGHTS

If you are a California resident, you may exercise CCPA-provided rights described above by either:

- Visiting https://www.williamsjones.com/ccpa; or
- Calling us at 212-935-8750.

Also, we are not obligated to respond to more than two requests for specific pieces of personal information from the same individual within a 12-month period. There is no similar cap on other categories of access requests (e.g., requests to know categories of Personal Information, sources, purposes, or third-party sharing).

VERIFICATION OF CONSUMER REQUESTS

Each verifiable consumer request must provide sufficient information to allow us to reasonably verify that you are the person about whom we collected Personal Information or an authorized agent. We cannot respond to your request if we cannot verify and confirm your identity or authority to make the request.

We will not require you to provide unnecessary information or impose verification requirements that are unduly burdensome or create unnecessary friction in the request process. Our verification procedures are designed to be proportionate to the nature of the request and the sensitivity of the information sought.

RESPONSE TIMING AND FORMAT

We will confirm receipt of your verifiable consumer request within 10 business days of receiving it and will provide information about how we will process the request. We intend to respond to a verified consumer request within 45 days of our receipt. If we require additional time to respond, we will inform you of the reason for the additional time needed and anticipated timing for our response. In no event will our response exceed 90 calendar days from receipt of the request (an initial 45-day period, extendable by an additional 45 days with notice to the consumer). Our response will also explain why we cannot comply with your request, if applicable.

DATA RETENTION

We retain each category of Personal Information (including Sensitive Personal Information) for as long as reasonably necessary to fulfill the purposes for which it was collected, as described in this Notice and the Appendix, and to comply with our legal and regulatory obligations. Specific retention criteria include:

- Identifiers and Financial Information: Retained for the duration of our client relationship and for a minimum of six (6) years after termination, as required by SEC Rule 204-2 (books and records requirements for investment advisers) and applicable anti-money laundering regulations, or longer if required by specific legal holds or litigation.

- Commercial Information (transaction records): Retained for the duration of the client relationship plus a minimum of six (6) years post-termination per SEC recordkeeping requirements.
- Internet or Electronic Network Activity Information: Server logs, cookies, and similar tracking data are retained for up to 24 months from collection, unless longer retention is required for security incident investigation or legal compliance.
- Professional, educational, or employment-related information: Retained for the duration of our client relationship plus six (6) years.
- Sensitive Personal Information (SSN/taxpayer IDs, passport numbers, account credentials): Retained as part of the client record for the duration of the relationship and the applicable post-termination retention period, with enhanced security controls. Credentials are subject to rotation and expiration policies.
- Other information (children's data, household demographics, preferences): Retained for the duration of the relationship for which the data was provided, plus three (3) years or the applicable legal retention period, whichever is longer.

When Personal Information is no longer required for the purposes described above and no legal obligation compels further retention, we will securely delete or de-identify the information in accordance with our data disposition policies.

MINORS

We do not knowingly sell or share the Personal Information of consumers under the age of 16. We do not collect Personal Information directly from children under 16. Where we receive limited Personal Information about a child from a client (a parent or other authorized adult) for purposes of establishing and maintaining accounts for the child's benefit, we do not sell or share that information.

If we have actual knowledge that a consumer is between 13 and 16 years of age, we will not sell or share their Personal Information unless the consumer has affirmatively authorized (opted in to) the sale or sharing. If we have actual knowledge that a consumer is under 13 years of age, we will not sell or share their Personal Information unless a parent or guardian has affirmatively authorized (opted in to) the sale or sharing on the child's behalf.

SHINE THE LIGHT

California law permits residents of California to request certain details about how their information is shared with third parties for direct marketing purposes. The Firm does not share Personal Information with third parties for their direct marketing purposes. To the extent any disclosure to advertising partners constitutes sharing for cross-context behavioral advertising under the CCPA (see the "Right to Opt Out of Sale/Sharing" section above), that activity is addressed by the CCPA opt-out mechanism, not the Shine the Light statute (Cal. Civ. Code § 1798.83).

ACCESSIBILITY

This Notice is available in an accessible format. If you have a disability and need this Notice in an alternative format, or if you need assistance accessing the opt-out mechanisms described in this Notice, please contact us at the information below. Our privacy rights request page (https://www.williamsjones.com/ccpa) and the "Do Not Sell or Share My Personal Information" link are designed to be accessible to consumers with disabilities, including compatibility with common assistive technologies.

ANNUAL REVIEW

We will review and update this Notice at least once every twelve (12) months to ensure it remains accurate and compliant with applicable law. Any material changes to this Notice will be reflected by updating the Effective Date above and, where appropriate, by providing additional notice on our website or by direct communication.

CONTACT US

You are encouraged to review this Notice regularly, as we may change it from time to time. If we make changes, we will notify you by revising the date at the top of the Notice and, in some cases, provide you with additional notice (such as adding a statement to our website homepage or sending you a notification).

If you have any questions about this Notice, please contact us at:

Michael J O'Brien

Chief Compliance Officer

Williams Jones Wealth Management, LLC

717 Fifth Ave., 11th Floor

New York, NY 10022

mobrien@williamsjones.com

Phone: (212) 935-8750

APPENDIX 1

WJWM Categories of Data Collected

The table below lists the categories of Personal Information WJWM may collect about its clients, including examples of information that fall within each category. For each category, we have also provided the categories of sources from which the information was collected, the purposes of collection and use, whether the category includes Sensitive Personal Information (SPI), the retention criteria, and the categories of third parties with whom we will share such data.

Category of PI Collected	SPI?	Sources	Purposes	Third Parties	Retention Criteria
Identifiers Full name, nicknames, mailing address(es), email(s), phone number(s), contact info for related persons, SSN/taxpayer ID, passport number, Client ID, account number	Yes (SSN/taxpayer ID; passport number)	You; other clients; service providers; first/third-party cookies & tracking tech	Provide advisory services; maintain records; security/fraud prevention; develop products/services; client service; contractual obligations; manage accounts; personalized communications; respond to inquiries	Parent companies; service providers; professional advisors; law enforcement; USPS/couriers; address verification providers; other third parties with consent	Duration of client relationship + 6 years (SEC Rule 204-2)
Financial Information Bank account numbers/details, account numbers at other institutions, account balances, payroll information	Yes (financial account numbers + credentials)	You; payment processors/financial institutions; service providers; inferred from account status/activity	Maintain business relationship incl. processing purchases/sales of securities; recordkeeping & compliance; internal business purposes (finance, audits, reporting, analytics)	Service providers (payment processors, financial institutions); professional advisors; other unaffiliated parties (incl. government agencies) as required by law	Duration of client relationship + 6 years (SEC Rule 204-2; AML requirements)
Commercial Information Client account info, transaction history, website/app usage records, non-biometric authentication data (passwords, security questions), client service records	Yes (passwords/credentials)	You; other financial institutions; automatically via website use	Maintain business relationship; recordkeeping & compliance; internal business purposes; risk management, fraud prevention	Service providers (mailing/delivery, print vendors); professional advisors; other unaffiliated parties as required by law	Duration of client relationship + 6 years
Internet or Electronic Network Activity Information IP address, device/persistent identifiers, system identifiers (usernames/credentials), encrypted password,	Yes (log-in credentials: username + encrypted password)	You and your devices; automatically via cookies/web beacons; service providers (computer security, advertising technology)	System administration/technology management; information security/cybersecurity; recordkeeping/reporting; metrics/analytics; better understand clients/prospects	Service providers (IT/security, fraud prevention); professional advisors; other third parties as required by law	Up to 24 months from collection (logs, cookies, tracking data); longer if required for security investigation

device characteristics, web server logs, application logs, first-party cookies, third-party cookies, web beacons/clear GIFs/pixel tags					
Professional, educational, or employment-related information Job title, employer name/industry, date of hire, educational info	No	You; your employer(s); education providers; service providers/data aggregators/public records	Establish/maintain business relationship; recordkeeping & compliance	Professional advisors; other third parties as required by law	Duration of client relationship + 6 years
Other information reasonably capable of being associated with you Child's name, DOB, address, SSN/taxpayer ID, educational info; personal characteristics/preferences; household demographics; hobbies/interests	Yes (child's SSN/taxpayer ID)	Parents/authorized adults; unaffiliated parties (publicly-available sources); service providers/data aggregators/public records; inferred	Provide info/products/services requested by parent/authorized adult; better understand clients; design products/services; identify prospective clients; internal business purposes	Professional advisors; other third parties as required by law	Duration of relationship + 3 years or applicable legal retention, whichever is longer

For security purposes, we will not disclose sensitive identifiers (SSN, passport number, financial account credentials) in response to an access request under the CCPA.