



## PRIVACY POLICY 2024 ANNUAL NOTICE

### **Privacy Policy**

Your relationship with Copperleaf Capital, LLC (“Copperleaf”) is based on trust and confidence. To fulfill its responsibilities to you, Copperleaf requires that you provide current and accurate financial and personal information. You deserve to expect that Copperleaf will protect your information in a manner that is safe, secure, and professional. Copperleaf and its employees are committed to protecting your privacy and to safeguarding your information.

### **About Copperleaf**

As a registered investment advisor, Copperleaf and its investment adviser representatives will gather and develop personal information regarding your finances. This information will be gathered and developed by Copperleaf for the following purposes:

- To determine your financial goals and objectives.
- To determine the level of advisory services that you might need.
- To provide you with specific recommendations regarding advisory services.
- To provide you with specific recommendations regarding financial products; and
- To provide you with ongoing support and recommendations regarding financial products.

Client information that Copperleaf will collect may include the following:

- Information received from you on financial inventories through consultations with our representatives, which may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account and other records concerning your financial conditions and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages, and tax returns.
- Information developed as part of financial plans, analyses or investment advisory services; and
- Information about your financial products and services transactions with Copperleaf and its affiliates.

### **Safeguarding Customer Documents**

Copperleaf collects non-public customer data in checklists, forms, written notations, statements and other documentation provided by our clients. It also creates and maintain internal schedules of such data.

During regular business hours access to customer records is monitored so that only those with approval may access the files. During hours in which the company is not in operation, the customer records are locked.

No unauthorized individual may obtain your personal and financial customer information. No individual with authorization to access personal and financial customer information shall share that information in any manner without your consent and the written consent of a Copperleaf principal. If any person working on behalf of Copperleaf fails to observe its customer privacy policies, such person will be subject to discipline, which may include termination.

When a client account is closed, Copperleaf will continue to keep all your information confidential in accordance with the principles stated in the privacy policy.



## **Sharing Nonpublic Personal and Financial Information**

Copperleaf is committed to the protection and privacy of their customers' personal and financial information.

Copperleaf will not share such information with any third party except:

- When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians.
- When required to maintain or service a customer account.
- To resolve customer disputes or inquiries.
- With persons acting in a fiduciary or representative capacity on behalf of the customer.
- With rating agencies, persons assessing compliance with industry standards, or to attorneys or accountants engaged to provide services to Copperleaf.
- To protect against or prevent actual or potential fraud, identity theft, or unauthorized transactions.
- To comply with federal, state, or local laws, rules and other applicable legal requirements.
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement; or
- In any circumstances with the customer's instruction or consent.

Should you desire Copperleaf to share your information with an outside vendor service provider, we will provide you with a form to complete at your request.

## **Opt-Out Provisions**

Copperleaf will not share non-public personal and financial information with third parties except under the circumstances noted above. Because sharing under the circumstances noted above is necessary to service customer accounts or is mandated by law, there are no allowances made for clients to opt-out.

## **Delivery**

A copy of the Privacy Policy Notice will be delivered to all clients in writing by at least one of the following methods:

- By hand delivering a copy to the client.
- Mailing a copy to the client's address on record; or
- If business is conducted electronically, a notice may be posted on an electronic site or transmitted to a client's email address as long as the client acknowledges receipt of the Privacy Policy Notice prior to the client obtaining any services or products from Copperleaf.

A copy of the Privacy Policy Notice will be provided to the client no later than the time a client establishes a relationship with Copperleaf, unless this situation would cause a delay in the client obtaining services, and the client agrees to accept the Notice at a later date. When this situation applies, a copy of the Privacy Policy Statement will be delivered to the client within a reasonable time period following the transaction.

Any time a change is made to the Privacy Policy, the statement to clients will be revised. The revised statement will be given to all affected clients prior to any disclosure of information. In addition, Copperleaf will provide a copy of its Privacy Policy Statement to all current and existing clients at least annually.

If you would like to receive a copy of Copperleaf's US Security and Exchange Commission disclosure filing Form ADV 2, please email your request to [rstack@copperleafcapital.com](mailto:rstack@copperleafcapital.com) or call toll-free at (877) 787-9725.