

Last Updated June 8, 2020

Forum Financial Management, LP ("[Forum](#)," "[we](#)," "[us](#)," or "[our](#)") has adopted this privacy policy ("[Privacy Policy](#)") with recognition that protecting the privacy and security of the personal information we obtain about our clients is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information.

If you are a California resident, please review our Supplemental Notice for California Consumers, which further describes the personal information we collect from California residents, how we use and share this information, and certain rights you may have under the California Consumer Privacy Act.

INFORMATION WE COLLECT

We collect certain nonpublic information about you ("**Client Information**"). The essential purpose for collecting Client Information is to allow us to provide financial advisory services to you. Client Information we collect may include the following:

- Information that you provide on applications or other forms 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 condition and assets. Additional information we may gather includes information concerning employee benefits and retirement plan interests, wills, trusts, mortgages, and tax returns.
- Identifying information such as your name, age, address, social security number, etc.
- Information about your transactions with us, or others (e.g. broker/dealers, clearing firms, or other chosen investment sponsors).
- Information we receive from consumer reporting agencies (e.g. credit bureaus), as well as other various materials we may use to provide an appropriate recommendation or to fill a service request.

In addition to the Client Information described above, when you access or use our websites, mobile apps, and other online services (collectively, "**Online Services**"), we also collect certain information regarding your access to and use of such Online Services ("**Usage Data**"). Usage Data consists of information about how your computer or device links to and interacts with our Online Services, preferences expressed, settings chosen, and information about your device, such as your device and browser type, operating system, IP address, mobile network carrier, device and advertising identifiers, date and time of visit, site features viewed, and the third-party site your device was accessing before coming to our Online Services. We use cookies and similar technologies on our Online Services to automatically receive and track this Usage Data, to enhance the security of our Online Services, to perform analytics concerning your use of our Online Services, and to comply with and enforce applicable legal requirements, industry standards and our policies. To learn more about these technologies and our use of them, please see the Cookies and Similar Technologies section below.

USE OF YOUR INFORMATION

- Forum uses Client Information for the following purposes: To provide financial services to our Clients such as processing and fulfilling financial transactions.
- To contact you to discuss the services you receive from us or to respond to any questions or concerns you have raised.
- To provide, support, personalize, and develop our websites and services.
- To create, maintain, customize, and secure your account with us.
- To verify your identity, for other fraud, crime prevention, or anti-money laundering activities, and other compliance checks and controls.
- As necessary or appropriate to protect the rights, property, or safety of us, our clients, or others.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our websites, products and services, databases and other technology assets, and business.
- To respond to valid law enforcement, legal, or regulatory requests and as required by applicable law, court order, or governmental regulations.
- For marketing purposes.

- For testing, research, analysis, and product development, including to develop and improve our websites, products, and services.

SECURITY OF YOUR INFORMATION

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

INFORMATION WE DISCLOSE

We do not disclose the nonpublic personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship with certain service providers, and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers, third-party service providers, insurance companies, etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose. If you decide at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, which may be amended from time to time.

FORMER CLIENTS

If you decide to close your account(s) or become an inactive client, we will adhere to our privacy policies, which may be amended from time to time.

DISCLOSURES TO ASSOCIATED FIRMS

Some of our advisors are associated with an unaffiliated broker-dealer. If you presently have a brokerage account at that firm, the broker-dealer has possession of your nonpublic information. These advisors may obtain information necessary to fulfill your requests, service your products or offer you other products or services of interest to you.

Certain partners or advisors are also associated with related accounting firms. If you are a client of a related accounting firm, these partners or advisors may obtain information necessary to complete your tax return. Necessary information may include Tax Related Documents such as 1099s and Realized Gains/Loss Reports.

Forum uses third-party technology to manage and aggregate client assets that are held away. This technology is provided by OWL Technology, LLC. Forum is affiliated with OWL Technology, LLC under common control and ownership. Clients are not charged extra for these services, but a portion of the client fee paid to Forum is paid to OWL Technology, LLC for these services.

COOKIES AND SIMILAR TECHNOLOGIES

When you visit or interact with the Online Services, we and other companies we work with may deploy and use cookies and similar technologies (such as web beacons, local shared objects and other tracking technologies) for a variety of reasons, including to collect Usage Data in order to enhance the security of Online Services, perform analytics concerning your use of Online Services, and comply with and enforce applicable legal requirements, industry standards, and our policies.

We may also use Google Analytics cookies to collect information about how visitors use Online Services. These cookies collect information in the aggregate to give us insight into how Online Services is being used. We anonymize IP addresses in Google Analytics, and the anonymized data is transmitted to and stored by Google on servers in the United States. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. For an overview of these Google Analytics cookies, please visit <https://support.google.com/analytics/answer/6004245>. You may install a Google Analytics Opt-out Browser Add-on by going to <https://tools.google.com/dlpage/gaoptout>.

You may have other means of controlling the use of cookies and similar technologies on this and other websites. You may be able to instruct your browser or mobile device to warn you each time a cookie is being sent, or to reject all or certain kinds of cookies. Typically, you can do this by changing the privacy settings on your internet browser or device. However, if you choose to reject cookies, Online Services may not function properly, and some Online Service features may be diminished.

DO-NOT-TRACK SIGNALS AND SIMILAR MECHANISMS

Certain web browsers may allow you to enable a “do not track” option that sends signals to the websites you visit indicating that you do not want your online activities tracked. This is different from blocking cookies as browsers with the “do not track” option selected may still accept cookies. Right now, there is no industry standard for how companies should respond to “do not track” signals, although one may be adopted in the future. Accordingly, we do not respond to “do not track” signals at this time. If we do so in the future, we will modify this Privacy Policy accordingly.

CHANGES TO OUR PRIVACY POLICY

Except as required or permitted by law, we do not share confidential information about you with non-affiliated third parties. In the unlikely event, there were to be a change in this fundamental policy that would permit or require additional disclosures of your confidential information, we will provide written notice to you, and you will be given an opportunity to direct us as to whether such disclosure is acceptable.

QUESTIONS

If you have questions about this Privacy Policy or have a question about the privacy of your customer information call our main number (630) 873-8520 and ask to speak to the Chief Compliance Officer.

Please contact our office if you would like a current copy of Forum’s ADV Part 2A mailed to you.

SUPPLEMENTAL NOTICE FOR CALIFORNIA CONSUMERS

Last Updated June 8, 2020

This Supplemental Notice for California Consumers (“Supplemental Notice”) provides information required under the California Consumer Privacy Act (*Cal. Civ. Code §1798.100 et seq.*), as amended (“CCPA”), and describes California residents’ right to know, right to delete, and right to object to the sale of Personal Information that Forum Financial Management, LP (“Forum,” “we,” “us,” or “our”) collected about them through online and offline activities. Any terms defined in the CCPA have the same meaning when used in this Supplemental Notice.

This Supplemental Notice applies only to information collected about California residents and is parallel in scope to our Privacy Policy. This Supplemental Notice, including the rights described below, may not apply to all data, such as:

- Publicly available information from government records;
- Deidentified or aggregated consumer information; and
- Information excluded from the CCPA’s scope, such as 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.

Please be aware that Forum collects relatively limited amounts of consumer Personal Information subject to all of the rights and provisions under the CCPA because the Personal Information we obtain is largely exempted from CCPA as personal financial data subject to the federal Gramm-Leach-Bliley Act or Fair Credit Reporting Act, or as Personal Information subject to an exemption under the CCPA for business-to-business (B2B) contacts. This Supplemental Notice applies to the limited Personal Information that we collect directly from consumers or about consumers that is not covered under these federal exemptions.

DEFINITIONS SPECIFIC TO THIS NOTICE

The CCPA includes definitions for terms specific to this Supplemental Notice that do not apply to Forum’s Privacy Policy generally, including the following terms:

- **“Personal Information”** means 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. In this Supplemental Notice, we use the following ***Categories of Personal Information*** to describe the Personal Information we collect, use, and share about consumers:
- **“Sale”** or **“sell”** means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s Personal Information by the business to another business or a Third Party for monetary or other valuable consideration.
- **“Service Provider”** means certain for-profit legal entities that process information on behalf of us and to which we disclose your Personal Information for a defined business purpose pursuant to a written contract that prohibits the Service Provider from retaining, using, or disclosing your Personal Information for any purpose other than for the specific purpose of performing the services specified in the contract.
- **“Third Party”** means another business, other than a Service Provider, that collects your Personal

Financial Information	Financial information, including bank account number, routing information, credit or debit card number, payment amounts, or other financial information.
Identifiers	Identifiers and contact information, including full name, alias, postal address, telephone number, email address, date of birth, account name, Social Security number, driver’s license number, passport number, unique personal identifier, IP address, online identifier, device or mobile advertising ID, service request ID number, or other similar identifiers.
Network Activity Data	Internet activity information, such as browsing history, search history, cookie data, referring/exiting URL, clickstream data, time spent on a webpage or advertisement, or other information regarding an individual’s interaction with an internet website, application, email, or advertisement.
Professional Information	Professional information, including employment history, job title, salary, or other professional and employment-related information.
Protected Characteristics	Characteristics of protected classifications under state or federal law, such as race, gender, physical or mental disability, age (40 years or older), citizenship, sexual orientation, veteran or military status, genetic information (including familial genetic information), and religion.
Written Signature	Written signature, such as a signature on an application, consent form, or program enrollment form.

CATEGORIES OF PERSONAL INFORMATION COLLECTED

We have collected the following Categories of Personal Information in the past 12 months:

- Financial Information
- Identifiers
- Network Activity Data
- Professional Information
- Protected Characteristics
- Written Signature

CATEGORIES OF SOURCES

We have collected the Categories of Personal Information identified above from the following categories of sources:

- Directly from consumers
- Consumer reporting agencies
- Advertising networks
- Internet service providers
- Broker-dealers (Custodians)
- Social networks
- Directly and indirectly from activity on our websites
- Data analytics providers

PURPOSES FOR COLLECTING PERSONAL INFORMATION

We collect the Personal Information identified above for the following purposes:

- To provide financial services to our Clients such as processing and fulfilling financial transactions.
- To contact you to discuss the services you receive from us or to respond to any questions or concerns you have raised.
- To provide, support, personalize, and develop our websites and services.
- To create, maintain, customize, and secure your account with us.
- To verify your identity, for other fraud, crime prevention, or anti-money laundering activities, and other compliance checks and controls.
- As necessary or appropriate to protect the rights, property, or safety of us, our clients, or others.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our websites, products and services, databases and other technology assets, and business.
- To respond to valid law enforcement, legal, or regulatory requests and as required by applicable law, court order, or governmental regulations.
- For marketing purposes.
- For testing, research, analysis, and product development, including to develop and improve our websites, products, and services.

DISCLOSURE OF PERSONAL INFORMATION

We disclosed for a business purpose the following Categories of Personal Information in the past 12 months to the categories of Third Parties identified:

Categories of Personal Information Disclosed	Categories of Third Parties to Whom the Information Was Disclosed
Financial Information	Third-party technology providers and Custodians
Identifiers	Third-party technology providers and Custodians
Network Activity Data	Third-party technology providers
Professional Information	Third-party technology providers
Protected Characteristics	Third-party technology providers and Custodians
Written Signature	Third-party technology providers and Custodians

We do not and will not sell your Personal Information to Third Parties.

YOUR RIGHTS

If you are a California resident, you have the following rights under the CCPA with respect to your Personal Information:

- Right to Notice. Before or at the time we collect Personal Information from you, you have the right to receive notice of the Personal Information to be collected and the purposes for which we use it.
- Right to Know. You also have the right to request that we disclose to you the Categories of Personal Information we have collected about you in the preceding 12 months, along with the categories of sources from which the personal information was collected, the purpose for collecting or selling the personal information, the categories of Third Parties with whom we

shared the personal information, and the categories of Third Parties with whom we sold the personal information. You may make such a request up to twice in a 12-month span.

- **Right of Access.** You have the right to request that we disclose or provide you with access to the specific pieces of Personal Information we have collected about you in the preceding 12 months.
- **Right to Deletion.** You have the right to request that we delete the Personal Information we collect from you. However, in certain situations we are not required to delete your Personal Information, such as when the information is necessary in order to complete the transaction for which the Personal Information was collected, to provide a good or service requested by you, to comply with a legal obligation, to engage in research, to secure our websites or other online services, or to otherwise use your Personal Information internally in a lawful manner that is compatible with the context in which you provided the information.
- **Right to Opt-Out of the Sale of Personal Information.** We do not and will not sell your Personal Information to Third Parties.

You can exercise your rights by calling 1-877-873-8520 or by emailing compliance@forumfin.com. Please note that there are circumstances in which we may not be able to comply with your request pursuant to the CCPA, including when we cannot verify your request and/or when there is a conflict with our own obligations to comply with other legal or regulatory requirements. We will notify you following submission of your request if this is the case.

VERIFICATION PROCESS

We value the security and confidentiality of your Personal Information. Therefore, if you exercise your right to know, right to access, or right to deletion, we must first verify your identity to make sure that you are the person about whom we have collected Personal Information. We will verify each request by asking that you follow our current procedures for verifying client identity such as providing your Forum account password. 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

We will not discriminate against you if you exercise any of the rights provided by the CCPA set forth in this Supplemental Notice. Please note that a legitimate denial of a request for information, deletion, or to opt-out is not discriminatory, nor is charging a fee for excessive or repetitive consumer requests as permitted by the CCPA.

DIRECT MARKETING DISCLOSURE

California Civil Code Section § 1798.83 permits California residents to annually request certain information regarding our disclosure of personal information to other entities for their direct marketing purposes in the preceding calendar year. Forum does not distribute your Personal Information to other entities for their own direct marketing purposes.

CONTACT US

If you would like additional information regarding our Supplemental Notice, please call us at 877-873-8520 or email us at compliance@forumfin.com.

CHANGES TO OUR SUPPLEMENTAL NOTICE

Forum reserves the right to amend this Supplemental Notice at our discretion and at any time. When we make material changes to this Supplemental Notice, we will notify you by posting an updated Supplemental Notice on our website with the effective date.