

WEST COAST CAPITAL MANAGEMENT LLC

PRIVACY NOTICE REGARDING CLIENT PRIVACY AS REQUIRED BY REGULATION S-P & REGULATION S-AM

Updated March 2024

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of West Coast Capital Management LLC.

Information We Collect: In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets, and income; and
- Information about your transactions with us, our affiliates, or others.

Categories of Information We Disclose: We may only disclose information that we collect in accordance with this policy. West Coast Capital Management LLC does not sell customer lists and will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account with us, except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company;
- To consumer reporting agencies,
- To third parties who perform services or marketing on our behalf;
- To your attorney, trustee, or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants, or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

How We Use Information: Information may be used among companies that perform support services for us, such as data processors, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you and/or West Coast Capital Management LLC;
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;
- **To keep you informed** about financial services of interest to you.

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. West Coast Capital Management LLC does not receive information regarding marketing eligibility from affiliates to make solicitations.

Our Security Policy: We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

Complaint Notification: Please direct complaints to: Gregory Brown, at West Coast Capital Management LLC, 1176 E. Warner Rd. Ste. 218, Gilbert, AZ 85296. 480-460-3790.

Your Rights and Choices: The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how you can exercise them.

Access to Specific Information and Data Portability Requests: You may request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Requests below), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, two separate lists disclosing: (i) sales, identifying the personal information categories that each category of recipient purchased; and (ii) disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Requests: You may request that we delete any of your personal information we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Requests), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request, in whole or in part in accordance with any purpose that is permitted by the CCPA. For example, we may deny your deletion request if retaining the information (or a portion thereof) is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a product 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 products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; and/or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Requests: To exercise an access, data portability, or deletion request as described above, please submit a verifiable consumer request to us in one of the following ways:

- Send an email to gbrown@westcoastfinancial.net to inquire as to which elements of your information are possible for us to delete.
- If you would like to close your account, please contact your investment adviser representative.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to confirm the requestor's identity or authority to make the request.

Response Timing and Format: We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

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.

Opting Out from the Sale of Personal Information: We do not sell your personal information. We will only use and share your personal information according to this Privacy Policy and as outlined in our Investment Advisor Agreement with you. If we later decide to sell our clients' personal information, you will be notified immediately and you will be provided with the proper disclosures and the opportunity to exercise your right to "opt-out".

Non-Discrimination: We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties other than for reasons described in our Form ADV Part 2A or Investment Advisory Agreement.
- Provide you a different level or quality of products or services except as otherwise described in our Form ADV Part 2A or Investment Advisory Agreement.
- Suggest that you may receive a different price or rate for products or services or a different level or quality of products or services except as otherwise described in our Form ADV Part 2A or Investment Advisory Agreement.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: West Coast Capital Management LLC; 1176 E. Warner Rd. Ste. 218, Gilbert, AZ 85296. 480-460-3790.