

FACTS

WHAT DOES HENNION & WALSH DO WITH YOUR PERSONAL INFORMATION?

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> ▪ Social Security number and income ▪ Investment experience and account balances ▪ Credit card/other debt and credit history
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Hennion chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Hennion & Walsh share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We Don't Share
For our affiliates' everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness	No	We Don't Share
For our affiliates to market to you	Yes	No
For nonaffiliates to market to you	No	We Don't Share

Questions?	<p>Call (800) 836-8240 or go to www.hennionandwalsh.com/privacy_policy</p> <p>Please note:</p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we can continue to share your information as described in this notice.</p>
	Call 1(800) 836-8240 or go to www.hennionandwalsh.com/privacy_policy

Who we are

Who is providing this notice?	Hennion & Walsh, Inc., Hennion & Walsh Asset Management, Inc., Hennion & Walsh Wealth Advisors, Inc.
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What we do

How does HENNION protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does HENNION collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> ▪ Open or service an account with us ▪ Seek advice about investments or direct us to buy securities ▪ Provide account information or give us your contact information <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> ▪ Sharing for affiliates' everyday business purposes – information about your creditworthiness ▪ Affiliates from using certain information to market to you ▪ Sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See "Other important information (continued)."</p>

Definitions

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>Our affiliates include Hennion & Walsh Asset Management, Inc.; Hennion and Walsh Wealth Advisors, Inc.</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>Hennion & Walsh does not share with nonaffiliates so they can market to you.</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ▪ <i>We do not have joint-marketing agreements with nonaffiliated third parties.</i>

Other important information

Do Not Call Policy. This notice is the Hennion Do Not Call Policy under the Telephone Consumer Protection Act. We do not solicit via phone numbers listed on the state or federal Do Not Call lists, unless the law permits. Consumers who ask not to receive telephone solicitations from Hennion will be placed on the Hennion Do Not Call list and will not be called in any future solicitations, including those of Hennion affiliates. If you communicate with us by telephone, we may monitor or record the call.

Other important information (continued)

Nevada Residents: We are providing you this notice pursuant to state law. You may be placed on our internal Do Not Call List by contacting us at 800-836-8240. Nevada law requires that we also provide you with the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Street, Suite 3900, Las Vegas, NV 89101; Phone number: (702) 486-3132; e-mail: BCPINFO@ag.state.nv.us.

California Residents: California Residents should refer to the privacy policy specific to California.

State Law: We follow state law if state law provides you with additional privacy protections. For example, we will not share information we collect about Vermont residents with companies outside of our corporate family, except as permitted by law, such as with your consent, to service your accounts or to other financial institutions with which we have joint marketing agreements. We will not share information about your creditworthiness within our corporate family except with your authorization or consent, but we may share information about our transactions or experiences with you within our corporate family without your consent.

Protecting Children's Privacy Online: Our online services are not directed to or intended for individuals under 18 years of age.

PROTECTION OF YOUR PERSONAL INFORMATION: We have procedural, physical and technological safeguards that protect against loss or unauthorized disclosure of your personal information. Procedurally, our employees are bound by, and held accountable to, a code of conduct and policies regarding confidentiality and the treatment of client information. Furthermore, only those employees who require access to your personal information in order to provide customary services (investment, administrative, legal) to your account are granted access to your personal information. Additionally, we have a dedicated group that designs, implements, and provides oversight of information security. We also monitor our systems infrastructure in order to detect weaknesses and potential intrusions. Physically, we have policies that require our employees to store and destroy documents containing your personally identifiable information in accordance with applicable laws, federal guidelines, and industry best practices. Technologically, we use methods such as encrypting files, utilizing firewalls to prevent unauthorized access to information, and restricting access to client information to prevent removal of information from the firm. Finally, should your relationship with us end, your personal information will remain protected in accordance with our obligations.

If you transact business through Hennion & Walsh Wealth Advisors, we may validate and obtain information about you from an insurance support organization. The insurance support organization may further share your information with other insurers, as permitted by law. We may share medical information about you to learn if you qualify for coverage, to process claims, to prevent fraud, or otherwise at your direction, as permitted by law. You are entitled to receive, upon written request, a record of any disclosures of your medical record information. Please refer to statements and other correspondence for mailing addresses.

If you interact with Hennion & Walsh directly as an individual investor (including joint account holders), we may exchange certain information about you with Hennion & Walsh affiliates, for their use in marketing products and services, as allowable by law.

California Privacy Policy

Hennion and Walsh, Inc. and its affiliates (collectively, “We”) are making this disclosure to comply with certain California laws, including the *California Consumer Privacy Act of 2018* (“CCPA”) and the *California Online Privacy Protection Act of 2003* (“CalOPPA”). Terms defined in such laws have the same meaning when used here.

This privacy policy supplements our general privacy notice (available at www.hennionandwalsh.com/privacy_policy/), but in case of any inconsistent provision, this policy overrides the general notice. We may update this policy periodically; in such cases, we will notify consumers of the changes by posting the updated policy on its website.

General privacy practices

Below are the categories of personal information that we have collected from consumers during the last 12 months. We may collect the same categories at various points online or offline. Consumers could be either clients or our employees, or other groups of California residents. The examples below are given only to provide a meaningful understanding of the category; not all examples are necessarily collected by us or for a given consumer group or across all such groups.

CCPA-Defined Category	Description	Collected?
A. Identifiers	A real name, alias, postal or e-mail address, unique personal ID, online identifier, IP address, account name, social security number, government-issued ID number, and other similar identifiers.	Yes
B. Categories listed in California Civil Code § 1798.80(e)	Signature, physical characteristics/description, telephone number, insurance policy number, bank account number, credit/debit card number, or any other financial information, medical information, or health insurance information. <i>(Overlaps with other categories have been excluded.)</i>	Yes
C. Protected classification characteristics under federal or California law	Sex, marital status, age (40 years or older), race, color, religion/creed, citizenship, national origin or ancestry, medical condition, physical/mental disability, sexual orientation, veteran or military status, genetic information.	Yes
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
E. Biometric information	Physiological (e.g., fingerprint), biological, or behavioral characteristics.	Yes, only for some employees
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
G. Geolocation data	Physical location or movements.	Yes, only for some employees
H. Sensory data	Audio (e.g., voice recording), electronic (e.g., surveillance footage), visual, thermal, olfactory, or similar information.	Yes
I. Professional or employment-related information	Current or past job history or performance evaluations.	Yes
J. Non-public education information	Education records directly related to a student maintained by an educational institution or party acting on its behalf.	Yes, only for some employees
K. Inference from other personal information	Reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

California Privacy Policy

Online collection

Except for persistent cookies, we do not collect personal information online unless consumers choose to provide it while using our websites or online services (including mobile applications, if any). Our customers wishing to change the content of the personal information they previously supplied online may do so by contacting us.

Although some internet browsers have incorporated Do Not Track ("DNT") features, we do not currently respond to DNT signals because we do not collect personal information online unless the customer voluntarily submits it and also because of a lack of industry standard about DNT.

We do not allow other parties to collect personal information about its customers' individual online activities over time or across different websites. We cannot, however, guarantee protection from web-based criminal conduct that could result in the collection of a customer's personal information by an outside party.

Consumer rights

Below are the key rights the CCPA has created for consumers. The last two are not relevant to us for reasons noted.

- 1) Right to know what personal information we have collected about the consumer from any source over the previous 12-month period. A consumer may exercise this right up to twice during a 12-month period.
- 2) Right to request deletion of the personal information we have collected from the consumer (subject to our legal and regulatory requirements).
- 3) Right to opt-out of sale of personal information. We do not sell personal information.
- 4) Right to non-discrimination for exercising any above right. We do not discriminate for such reason.

To exercise the first two rights listed above, consumers may submit a verifiable request by calling us at (800) 836-8240.

Request verification and fulfillment

After receiving a request, we attempt to verify it over the phone. The requestor must provide certain information to prove that he or she is the same person as the consumer referred to in the request. Such information varies depending on the nature of the request and other factors as stipulated by the CCPA. We may ask for additional information to properly understand, evaluate, and respond to the request. Once the request is verified, we attempt to fulfill it within 45 days (since the day of the request) or an extension as allowed by the CCPA. Some restrictions may apply to the fulfillment of the request.

Designating an authorized agent

A consumer willing to designate an authorized agent to make a CCPA request on the consumer's behalf must provide the agent a written permission in a manner that complies with the applicable California law. The agent must arrange to submit to us the proof of such permission by calling us at (800) 836-8240. In some cases, we may require that the consumer verifies his/her identity directly with us.

Effective Date: August 1, 2024