



Privacy Policy

At Fiat Lux Capital Management, Inc., we are committed to protecting the privacy and security of your personal information. This Privacy Policy explains how we collect, use, disclose, and protect your information when you interact with our website and our advisory services. This policy complements—does not replace—our GLBA/Reg P Privacy Notice.

1. Information we collect

We may collect personal information when you engage with our website, open or maintain accounts, or receive advisory services, including:

- **Identifiers:** name, address, email address, phone number, date of birth, Social Security number, driver's license information
- **Financial information:** income, net worth, bank and brokerage account details, account balances, holdings, investment experience, investment records, transaction history, and tax documentation
- **Estate planning documents** and beneficiary information you provide
- **Investment preferences and objectives**
- **Website analytics:** cookies and similar technologies used to understand site usage and improve your experience

2. How we use your information

We use personal information to:

- **Provide and improve** our advisory services and operate our business
- **Open and service accounts**, process transactions, and coordinate with custodians (for example, **Altruist**) and other service providers
- **Communicate with you**, including responding to inquiries and providing updates
- **Personalize your experience** and tailor educational content
- **Comply with legal and regulatory requirements**

3. Information sharing

We do not sell your personal information. We share it only as permitted by law and as described in our GLBA/Reg P Privacy Notice:

- **Affiliates:** Lauer Financial Services, Inc. and Fitzpatrick CPA & Financial Services, LLC. We may share information about your transactions and experiences with our affiliates. We do **not** allow affiliates to use your information to market to you.
- **Service providers (nonaffiliates)** who perform services on our behalf, such as custodians, IT and cybersecurity providers, data analytics, transcription, and—where used—carefully vetted **artificial intelligence vendors acting solely as our processors** under contracts that restrict use and require safeguards
- **Professional advisors** such as auditors, attorneys, or accountants
- **Legal and regulatory authorities** as required by applicable law
- We do not allow nonaffiliated companies to use your information to market their products or services to you.

4. Data security and incident response

We implement physical, technical, and administrative measures to protect your information, including encryption, role-based access controls, employee training, vendor oversight, secure disposal, and continuous monitoring. We maintain a **written incident-response program**. If there is unauthorized access to sensitive customer information, we will provide written notice to affected customers **as soon as practicable and no later than 30 days** after we become aware, consistent with **SEC Regulation S-P** and applicable law.

5. Your choices and rights

- You may **access, correct, or update** your information by contacting us.
- You may **opt out of certain communications** (e.g., marketing emails) by using the unsubscribe link or contacting us.
- To submit privacy preferences or request paper copies of notices, visit <https://www.fiatluxcapital.com/adv-privacy-policy-t-c> or contact us at the number/email below.
- For any applicable privacy rights under state law, please contact us to exercise those rights.

6. Electronic delivery

We provide privacy notices and updates **electronically by default** using methods reasonably designed to reach you. To request paper delivery, call **262-534-7100** or email info@fiatluxcapital.com.

7. Updates to this Policy

We may update this Policy to reflect changes in our practices or legal requirements. We will post updates on our website with a revised effective date.

8. Contact us

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