BLACKLINES

515 S Flower St, 18th Floor, Los Angeles, CA 90071

(213) 789-6950 | info@blacklinesfinancial.com

Privacy Policy

Effective Date: March 30th, 2026

Our Commitment to Your Privacy

At BlackLines, your trust is the foundation of everything we do. We are committed to safeguarding your personal information and maintaining the highest standards of privacy and confidentiality. This policy describes how we collect, use, share, and protect your information—including when we use technology-assisted tools to serve you better.

We are bound by professional standards of confidentiality that are even more stringent than those required by law. We will never sell your personal information. Federal law gives you the right to limit some sharing of personal information, and this policy explains how we honor those rights.

We provide this privacy policy to all clients annually and whenever we make material changes to our practices.

Information We Collect

We collect nonpublic personal information ("NPI") about you that is provided directly by you or obtained with your authorization. This may include, but is not limited to:

- Social Security number and date of birth
- Banking and financial account numbers and balances
- Sources of income and employment information
- Credit card numbers and credit-related information
- Contact information such as name, address, email, and phone number
- Investment objectives, risk tolerance, and financial goals

In addition, when you interact with us through technology-assisted services—such as virtual meetings, digital communications, or automated advisory tools—we may collect information generated through those interactions, including meeting recordings, transcripts, and AI-generated summaries, but only with your explicit consent.

How We Use Your Information

We use the information we collect to:

- Design and deliver personalized investment management and financial planning services

- Process transactions and maintain your accounts
- Communicate with you about your portfolio, market updates, and our services
- Comply with federal and state laws and regulatory requirements
- Improve the quality and efficiency of our services through technology-assisted tools

Use of Automated and AI-Powered Technologies

BlackLines may use automated technologies, including artificial intelligence, to support and enhance the services we provide. These tools assist with functions such as meeting documentation, investment research, data analysis, and client communications. We want you to understand how we use these technologies and the safeguards we have in place:

Meeting Documentation

- We may use AI-powered tools to record, transcribe, and summarize client meetings. Recording will only occur with the explicit consent of all participants.
- If any participant withdraws consent during a meeting, recording is stopped immediately.
- All transcripts, recordings, and AI-generated summaries are reviewed by your advisor for accuracy and stored securely in your client file.

Investment Research and Analysis

- Automated tools may be used to assist with investment research, market analysis, and portfolio evaluation.
- These tools are never the sole basis for investment decisions. All AI-generated outputs are validated using reliable, independent sources and reviewed by qualified professionals.
- Data inputs used by these tools are tested for accuracy before use and reviewed periodically.

Vendor Standards

- All technology vendors, including AI platform providers, undergo a thorough due diligence process before adoption. This includes review of their privacy policies, terms of service, and cybersecurity practices.
- We require our AI technology vendors to maintain SOC 2 Type II compliance, ensuring robust standards for security, availability, confidentiality, and privacy.

When We Share Your Information

Like all investment advisers, we may need to share personal information to operate our business. Below are the circumstances under which we may share your information:

- Everyday business purposes – such as processing transactions, maintaining your accounts, responding to court orders and legal investigations, or reporting to credit bureaus
- Marketing – to offer our products and services to you
- Joint marketing – with other financial companies under a formal agreement [In a limited capacity]
- Affiliates' everyday business purposes – information about your transactions and experiences

We do not share your information with non-affiliates for their marketing purposes. If you are a new client, we may begin sharing your information on the day you sign our advisory agreement. When you are no longer our client, we may continue to share your information only as described in this notice.

How We Protect Your Information

We take the security of your personal information seriously and employ multiple layers of protection:

- Physical safeguards – secured offices and controlled access to facilities where client information is stored
- Technical safeguards – encryption, firewalls, secure file storage, and access controls on all systems that handle client data
- Administrative safeguards – employee training, internal policies, and ongoing compliance monitoring

AI and Technology-Specific Safeguards

- We maintain a centralized inventory of all AI and automated tools in use across the firm, subject to periodic review and documentation.
- Our team reviews all new AI technologies prior to implementation and ensures ongoing compliance with our policies.
- Our procedures are regularly updated in response to regulatory changes and technological advancements.
- Where automated tools are used in trading or portfolio management, pre-trade controls, real-time monitoring, and shut-off capabilities are in place.

Your Rights and Choices

Federal law gives you the right to limit certain types of information sharing:

- You may opt out of sharing for affiliates' everyday business purposes related to your creditworthiness.
- You may opt out of sharing with affiliates or non-affiliates who would use your information to market to you.

State laws may provide you with additional rights. To exercise any of these rights or to opt out, please contact us using the information below. We will process your request promptly.

You also have the right to withdraw consent for AI-assisted meeting recordings at any time. Simply inform your advisor before or during any meeting, and recording will not be initiated or will be stopped immediately.

Key Definitions

Affiliates – Companies related by common ownership or control. They can be financial and non-financial companies.

Non-Affiliates – Companies not related by common ownership or control. They can be financial and non-financial companies.

Joint Marketing – A formal agreement between non-affiliated financial companies that together market financial products or services to you.

Nonpublic Personal Information (NPI) – Personally identifiable financial information that is not publicly available, such as your Social Security number, account balances, income, and transaction history.

Contact Us

Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us. If you have any questions about this policy or wish to exercise your rights, please contact us:

BlackLines
515 S Flower St, 18th Floor

Los Angeles, CA 90071

Phone: (213) 789-6950

Email: info@blacklinesfinancial.com