

Dowling & Yahnke, LLC (collectively “Dowling & Yahnke,” “our,” “us,” “we”) is a SEC-registered investment adviser located in San Diego, California. Our website (“Website”) is provided to you without charge as a convenience and for your information only.

PROTECTING YOUR PERSONAL INFORMATION IS IMPORTANT

Through our Website, clients have access to a broad range of services. To deliver these services as effectively and conveniently as possible, it is essential that we manage and maintain certain client information.

Financial companies choose how they share your personal information. U.S. federal law and European data privacy laws give consumers the right to limit some but not all sharing. Applicable data privacy laws also require us to tell you how we collect, share, and protect your personal information.

Your privacy is very important to us. We respect your confidentiality and any information you provide to us on this Website will never be sold, traded, rented, or shared with other organizations for promotional purposes.

Dowling & Yahnke, an independent investment management firm, is committed to safeguarding your personal information. To affirm our continued commitment to the proper use of present and former client information and protecting your privacy, we have set forth the following privacy policies.

By visiting this Website, you are accepting the practices described in this Privacy Policy. If you do not agree to this policy, please do not use this Website.

CHANGES TO OUR PRIVACY POLICY

The current version of this online privacy policy can be accessed from the link on the bottom of our homepage, or at the bottom of our other Website pages. By accessing our Website after we have posted changes to this online privacy policy, you are agreeing to the terms of the online privacy policy as modified.

Categories of Personal Information We Collect

In connection to our services, the categories of personal information we collect from you about your personal finances may include: 1) information we receive from you on custodian applications or other forms, 2) verbal or written communications, and 3) information about transactions enacted on your behalf at your investment custodian.

When you visit our Website, we collect information from you when you register or fill out a form. We are the sole owners of the information collected on this Website. We will not sell or share this information with anyone.

The specific types of personal information we collect, and share depend on the service you have with us. This information can include:

- Personal Information such as name, telephone, and address.
- Digital Footprint Data such as e-mail, login information, and IP addresses.

HOW IS YOUR PERSONAL INFORMATION USED?

We will only use your personal information with the purpose to provide you with our investment services. In managing your investments for you, we may use your personal information to:

- communicate with you and respond to your inquiries,
- send periodic emails including company news, updates, and related service information,
- monitor, audit, evaluate and otherwise administer our services,
- provide continuous service to you and to conduct business processing functions by providing personal information to our related bodies corporate, contractors, service providers or other third parties,
- assist with the administrative, marketing, planning, service development, quality control, or research purposes of Dowling & Yahnke and its contractors and service providers,
- conduct investigations and comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies and terms,
- for other purposes required or authorized by law, including other purposes for which you have provided your consent,
- protect against, identify and prevent fraud, copyright infringement, unauthorized use and distribution of protected content and other unlawful activity, claims and liabilities, and/or
- perform data analyses (such as market research).

If at any time you would like to unsubscribe from receiving future emails, we include unsubscribe instructions at the bottom of each email.

In addition to the above, we use personal information to comply with legitimate interests (such as managing our Websites and client relationships). Where required by applicable law, we obtain consent to process personal information.

In the event that we use personal information we collect for other purposes not identified above where direct client consent is required under applicable rules, laws and/or regulations, we will provide specific notice at the time we collect such personal information.

LAWFUL BASIS FOR PROCESSING

Dowling & Yahnke may have one or more of the following lawful bases to process your personal information:

- Consent: your freely, informed, and voluntary consent to process your personal information in connection to our investment services.
- Contract: processing your personal information is necessary in order to fulfill a contract.
- Legal Obligation: processing is necessary to comply with applicable rules, laws, and regulations.
- Legitimate Interests: processing is necessary to the legitimate interests of our firm and/or a third party.

ACCURACY OF PERSONAL INFORMATION

We will endeavor to ensure your personal information is kept accurate, complete, up to date and relevant. Please let us know if any of your details change. If you feel your personal information is not accurate, complete or up to date, please notify us and we will take reasonable steps to ensure it is corrected. You can contact us using the details listed below.

DISCLOSURE TO THIRD PARTIES

In order to implement strategies and transactions, we may be required to provide this information to non-affiliated third parties. Only the information required to implement the strategy or transaction is provided. Non-affiliated third parties often include discount broker/dealers, tax professionals, attorneys, bankers, and other investment-related businesses with which you do business. If required, we may disclose non-public personal information, such as name and brokerage account number, to a third-party service provider in connection with the filing of class action securities claims on your behalf. Participation is strictly voluntary, and you may opt out of this service at any time. Dowling & Yahnke does not have any affiliate companies, does not share with nonaffiliates so they can market to you, and does not jointly market.

With respect to information collected on our Website, we do not sell, trade, rent, or otherwise share information collected on this website with other organizations.

In the section below pursuant to U.S. Federal Laws, we list the reasons financial companies can share their customers' personal information; the reasons Dowling & Yahnke chooses to share; and whether you can limit this sharing.

Reasons we can share your Personal Information	Does Dowling & Yahnke share?	Can you limit sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations	Yes	No
For our marketing purposes — to offer our services to you	No	We don't share
For joint marketing with other financial companies	No	We don't share
For our nonaffiliates to market to you	No	We don't share

LIMITS ON SHARING

To the extent U.S. Federal laws apply to your personal information, you have the right to limit only:

- sharing for affiliates' everyday business purposes—information about your creditworthiness;
- affiliates from using your information to market to you; and
- sharing for nonaffiliates to market to you.

U.S. state laws and individual companies may give you additional rights to limit sharing.

SECURITY OF PERSONAL INFORMATION

We implement a variety of security measures to maintain the safety of your personal information. Internally, we limit access to your personal information to those employees who need to know in order to conduct our business, service your account, and assist you in accomplishing your investment objectives.

In addition, each employee is required to comply with Dowling & Yahnke, LLC's Code of Ethics, Privacy Policy, Employee Confidentiality & Non-Disclosure Agreement, and Privacy & Information Security Policy, which reiterates the confidentiality of all our clients' information.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. Electronic information is subject to all reasonable access control and intrusion prevention technologies. Physical access to electronic and paper records is secured with access codes and locks.

We do not provide your personal information to mailing list vendors or solicitors.

Third party links. Our Website contains links to enable you to visit other Websites of interest easily. These third-party sites have separate and independent privacy policies. We, therefore, have no responsibility or liability for the content and activities of these linked sites. We encourage you to read the associated privacy policies by such third-party Websites to learn more about their data privacy management practices.

DO WE USE COOKIES?

We use "cookies" on this site. A cookie is a piece of data stored on a site visitor's hard drive to help improve your access to our site and identify repeat visitors. Cookies can also enhance the experience on our site. Usage of a cookie is in no way linked to any personally identifiable information on our site.

Automated Decision Making. This site contains cookies that function as an automated decision-making mechanism to determine user location.

Third-party cookies. When you visit our Website, you may receive cookies that are set by third parties. These cookies are used for the purposes described in the above "How We Use Your Personal Information" bullet points. We do not control the setting of these third-party cookies, so we suggest you check the third-party Websites for more information about their use of cookies and how to manage them.

Amending Internet browser settings to disable cookies. You can configure your browser to accept all cookies or to alert you every time a cookie is offered by a Website's server. Most browsers automatically accept cookies. You can set your browser option so that you do not accept cookies. You can also delete existing cookies from your browser. You may find that some parts of the site will not function properly if you do not accept cookies. Please be aware that if you do not configure your browser to refuse cookies, you will accept cookies provided by this Website. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences. In addition, a number of companies offer utilities designed to help you visit internet sites anonymously.

For more information about cookies and how to disable them please visit www.allaboutcookies.org, or you may consult the vendor documentation for your specific software.

For more information on how our firm utilizes cookies, please refer to our Online Cookie Policy.

HOW DO WE RESPOND TO DO NOT TRACK SIGNALS?

We do not track users across time or over multiple sites. Therefore, we do not receive, or respond to, browser do-not-track signals or other similar mechanisms. However, as noted above, some third-party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you.

Amending your internet browser's Do Not Track signal: Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers and is a way for users to inform sites and services that they do not want certain information about their webpage visits collected over time and across sites or online services.

To learn more about setting up a Do Not Track signal, please visit <https://allaboutdnt.com/>.

For more information on how our firm responds to Do Not Track signals, please refer to our Cookies Policy.

WILL YOUR PERSONAL INFORMATION BE KEPT ACCURATE, COMPLETE AND UP TO DATE?

We will endeavor to ensure your personal information is kept accurate, complete, up to date, and relevant. Please let us know if any of your details change. If you feel your personal information is not accurate, complete, or up to date, please notify us and we will take reasonable steps to ensure it is corrected. You can contact us using the details listed below.

INDIVIDUAL RIGHTS

To the extent permitted by the applicable law of your jurisdiction, in relation to your personal information, you may request:

- to have your personal information corrected, for example, if it is incomplete or incorrect;
- to opt out of receiving marketing communications at any time;
- the right to file a complaint with an applicable government regulator such as a Data Protection Authority.

In addition to the foregoing, if you are located in the European Economic Area ("EEA"), to the extent permitted by applicable law, in relation to your personal information, you may request:

- to access the personal information held by us about you,
- the right to restrict or object to the processing of your personal information, or request that your personal information is erased,
- the right to receive a copy of the personal information which you have provided to the firm, in a structured, commonly used and machine-readable format (known as "data portability"),

- have a copy of the personal information we hold about you provided to you or another controller where technically feasible,
- where you have provided personal information voluntarily, or otherwise consented to its use, the right to withdraw your consent.

SECURITY OF PERSONAL INFORMATION

Internally, we limit access to your personal information to only those employees who have need to know in order to conduct our business or professional reason for knowing it, service your account, and who assist you in accomplishing your investment objectives. In addition, each employee is required to comply with Dowling & Yahnke, LLC's Code of Ethics, Privacy Policy, Employee Confidentiality and Non-Disclosure Agreement, and Privacy & Information Security Policy, which reiterates the confidentiality practice we employ in an effort to protect your personal information.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. Electronic information is subject to all reasonable access control and intrusion prevention technologies. Physical access to electronic and paper records is secured with access codes and locks. We do not provide your personal information to mailing list vendors or solicitors.

To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to your information.

To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain.

DATA RETENTION AND PROCESSING OF PERSONAL INFORMATION

To the extent permitted by applicable law, we retain your personal information for the period necessary to serve the purposes for which we obtained it. Personal information about you will be maintained during the time you are a client, and thereafter, as such records are required to be maintained by federal and state securities law, consistent with the CFA Standards of Professional Conduct and the CFP Board's *Standards of Professional Conduct*, and other applicable laws, and regulations. As permitted by law, U.S. and European regulatory authorities, including U.S. federal and state securities regulators, may review Dowling & Yahnke, LLC's records and your personal records, consultants and attorneys to assist in meeting our regulatory obligations. After the required period of record retention, all information may be destroyed.

Dowling & Yahnke, LLC may also retain your personal information beyond the period of time for which it was originally obtained as permitted by applicable laws, regulations, or another lawful basis, including but not limited to, compliance with our contractual obligations, legal obligations, regulatory obligations, legal claims, or another legitimate interest.

INFORMATION ABOUT CHILDREN

This Website is not directed to children under the age of 18 years. By using this Website, you represent and warrant that you are at least 18 years old.

In accordance with the Children's Online Protection Act ("COPA"), we do not knowingly solicit or collect personal information on the site from children under the age of 13 without prior verifiable parental consent.

DATA TRANSFERS

We may transfer the personal information we obtain about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. To the extent required by applicable law, when we transfer your information to recipients in other countries, we will protect that information as described in this Online Privacy Policy.

If you are located in the EEA, we will comply with applicable legal requirements regarding the provision of appropriate safeguards for the transfer of personal information to recipients in countries for which the European Commission has not issued an adequacy decision.

DATA CONTROLLER

As identified under applicable law, the data controller for this Website is: Dowling & Yahnke, LLC located at the address below.

CONTACTING US

If there are any questions regarding this online privacy policy, you may contact our Chief Compliance Officer, Karrol Gibbs, using the information below.

Karrol Gibbs
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