



## California Consumer Privacy Act Disclosure

*Effective 7/1/2020*

Keeping your personal information secure is one of our most important priorities. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, electronic, procedural and organizational safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or elsewhere.

**Legal Entities.** This disclosure is effective for Tolleson Wealth Management and its related entities, Tolleson Private Bank and Tolleson Private Wealth Management.

**Applicability.** This California Consumer Privacy Act Disclosure explains how the legal entities listed above (“Tolleson”, “we”, or “us”) collect, use and disclose personal information relating to California residents (“you” or “your”) covered by the California Consumer Privacy Act of 2018 (“CCPA”). This notice is provided pursuant to the CCPA.

**Introduction.** Under the CCPA, ‘Personal Information’ is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident. The CCPA, however, does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act (“GLBA”).

The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this Disclosure does not apply with respect to information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes. For more information about how we collect, disclose, and secure information relating to these customers, please refer to our [US Consumer Privacy Notice](#).

The following describes the information we collect about you, how it may be shared, and your rights connected with that information.

### CATEGORIES OF PERSONAL INFORMATION WE COLLECT

Most of the information we have collected has been collected in the context of providing financial products and services, and is therefore not subject to the CCPA. We also collect personal information relating to California residents within our “contact us” link on our webpage.

In the past 12 months, we have collected the following categories of personal information, as defined in the CCPA, relating to California residents. The categories of personal information that we collect, use, and disclose about a California resident will depend on our specific relationship or interaction with that individual. The examples provided in each category below include both financial and non-financial information and are for illustrative purposes only, and may not reflect what Tolleson collects.

<b>CCPA Categories</b>	<b>Illustrative Examples</b>
Identifiers	Name, address, email address, social security numbers, or other similar identifiers
Personal information (as identified in the California Customer Records Act, Ca. Civ. Code §1798.80)	Contact and financial information
Protected classifications under California or federal law	Age, marital status, sex, and veteran or military status
Commercial information	Information about past transactions or purchases
Audio, electronic, visual, or similar information	Call and video recordings
Inferences drawn from other personal information	Certain inferences concerning an individual's preferences and characteristics

## **CATEGORIES OF SOURCES OF PERSONAL INFORMATION**

In the past 12 months, we have collected personal information relating to California residents from the following sources:

<b>Sources</b>	<b>Illustrative Examples</b>
Directly from you	Interactions through our website, financial transactions, or applications for services such as loan applications, deposit account applications, or wealth management and other service applications
Affiliates	Companies related by common ownership or control, which include Tolleson Private Wealth Management and Tolleson Wealth Management
Service providers	Software providers, communication services, fraud prevention services
Third parties that you have authorized or directed to share your information with us	Payment processors, credit management programs, retailers, lenders, custodians
Government or public sources	Public data published by state or federal governments

## **PURPOSES FOR WHICH WE USE PERSONAL INFORMATION**

Most of the information we use is in context of providing financial products or services, and is therefore not subject to the CCPA. We may use personal information relating to California residents for one or more of the following business purposes:

- Providing and maintaining our products and services
- Verifying your identity
- Detecting and preventing fraud
- Protecting against security risks
- Maintaining our facilities, systems, and infrastructure
- Improving our products and services

- Carrying out our legal and business purposes, such as complying with federal, state, or local laws, responding to civil, criminal, or regulatory lawsuits or investigations, exercising our rights or defending against legal claims, resolving complaints and disputes, performing compliance activities, performing institutional risk control, and otherwise operating, managing, and maintaining our business
- As otherwise disclosed to you at or before the point of collecting your personal information

We may also use personal information relating to California residents for one or more of the specific “business purposes” listed in the CCPA:

- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Debugging to identify and repair errors that impair existing intended functionality
- Performing services on behalf of Tolleson or its service providers, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, or providing similar services on behalf of Tolleson or its service providers
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service that is owned or controlled by Tolleson, and to improve, upgrade, or enhance the service that is owned or controlled by Tolleson

## DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

In the past 12 months, we have disclosed each of the above-listed categories of personal information concerning California residents for our business purposes to one or more of the following categories of third parties:

<b>Sources</b>	<b>Illustrative Examples</b>
Affiliates	Companies related by common ownership or control, which include Tolleson Private Wealth Management and Tolleson Wealth Management
Service providers	Software providers, communication services, fraud prevention services
Third parties, when you have authorized or directed us to share your information with them	Payment processors, credit management programs, retailers, lenders, custodians
Government entities and others, when we share information for legal or necessary purposes	Regulatory and law enforcement agencies

In the past 12 months, we have not shared personal information relating to California residents in a manner that we consider a sale within the meaning of the CCPA.

## **RIGHTS UNDER THE CCPA**

If you are a California resident, you may request that we disclose to you the following information covering the 12 months preceding your request:

- The categories of personal information described above that we have collected about you and the categories of sources from which we collected such personal information
- The business or commercial purposes for collecting such personal information
- The categories of personal information about you that we have disclosed to third parties for a business purpose and the categories of third parties to whom we have disclosed such personal information
- The specific pieces (e.g., copies) of personal information we have collected about you

California residents also have the right to submit a request for deletion of personal information under certain circumstances, although there may be legal or other reasons that Tolleson will retain your information.

In some instances, we may decline to honor your request. For example, we may decline to honor your request if we cannot verify your identity or confirm that the personal information that we maintain relates to you, or if we cannot verify that you have the authority to make a request on behalf of another individual. In other instances, we may decline to honor your request where an exception applies, such as where the disclosure of personal information would adversely affect the rights and freedoms of another consumer or where the personal information that we maintain about you is not subject to the CCPA. Nonetheless, you have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

## **HOW TO MAKE REQUESTS**

If you are a California resident and would like to exercise the rights described above, please submit your request by contacting us at 888-807-5550, Monday through Friday, 8:00 a.m. -5:00 p.m., or writing to us at:

Tolleson Wealth Management  
5500 Preston Road Suite 250  
Dallas, TX 75205

Once we receive your request, we may verify your identity through your account or by requesting information sufficient to confirm your identity.

If you would like to use an agent to exercise your CCPA rights, or if you are an agent seeking to exercise CCPA rights on behalf of another person, please contact us using one of the above-referenced methods.

We may change or update this CCPA Disclosure in the future. When we do, we will post the revised CCPA Disclosure on our website. This CCPA Disclosure was last updated and became effective on the date posted at the top of this page.

**CONTACT US**

If you have questions about this CCPA Disclosure or our privacy notices, please contact us at 888-807-5550.