FACTS

WHAT DOES BRIGHTON JONES 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:

- Social Security number and income
- Account balance and payment history
- Credit history and credit scores

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 Brighton Jones chooses to share; and whether you can limit this sharing.

| Reasons we can share your personal information | Does Brighton Jones 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 | Yes |
| 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 |

To limit our sharing

Call 206-258-5000 and ask to speak to our Chief Compliance Officer, or email our Chief Compliance Officer at compliance@brightonjones.com and describe how you would like to limit our sharing as described above.

Please note:

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

Questions?

- Call 206-258-5000 and ask to speak to our Chief Compliance Officer
- Email our Chief Compliance Officer at compliance@brightonjones.com

| Who we are | | |
|--|--|--|
| Who is providing this notice? | Brighton Jones LLC and its affiliated private investment funds. Brighton Jones LLC also operates under the name OpenPlan®. | |
| What we do | | |
| How does Brighton Jones 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. We maintain a comprehensive information security program designed to protect the security and confidentiality of customer information, protect against threats to the security of such information and prevent unauthorized access. | |
| How does Jones collect my personal information? | We collect your personal information, for example, when you open an account or deposit money tell us where to send the money tell us about your investment or retirement portfolio | |
| | Direct us to buy securitiesMake deposits or withdrawals from your account | |
| | We also may collect your personal information from others, such as credit bureaus, affiliates, or other companies. | |
| Why can't I limit all sharing? | Federal law gives you the right to limit only | |
| | sharing for affiliates' everyday business purposes—information about your creditworthiness affiliates from using your information to market to you sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to | |
| | limit sharing. | |
| What happens when I limit sharing for an account I hold jointly with someone else? | Your choices will apply to everyone on your account. | |
| Definitions | | |
| Affiliates | Companies related by common ownership or control. They can be financial and nonfinancial companies. | |
| | Our affiliates include Lenora Capital, LLC, Brighton Jones Real Estate Advisors, LLC, The Brighton Jones Richer Life Foundation, Richer Life DAF Foundation, OpenPlan, and our affiliated private investment funds. | |
| Nonaffiliates | Companies not related by common ownership or control. They can be financial and nonfinancial companies. | |
| | Brighton Jones does not share with nonaffiliates so that they can market to you. | |
| Joint marketing | A formal agreement between nonaffiliated financial companies that together market financial products or services to you. | |
| | Brighton Jones does not jointly market. | |
| Other important information | | |
| Other important information | | |

Additional Information for California Residents