

PRIVACY POLICY/REGULATION S-P NOTICE

Established January 1, 2018

For the Year Ended December 31, 2025

**Promus Advisors
8226 Douglas Avenue, Suite 650
Dallas, Texas 75225
214-612-5750**

PROMUS ADVISORS – PRIVACY POLICY - Effective March 1, 2025

INTRODUCTION

Promus Advisors ("We" or "Company") is committed to protecting the privacy of your personal information. This Privacy Policy outlines how we collect, use, share, and secure your personal information as an investment advisory client, in accordance with the Securities and Exchange Commission (SEC) regulations, including Regulation S-P (Privacy of Consumer Financial Information).

Our clients' privacy is not for sale. Neither Promus Advisors nor any of our affiliates sells nonpublic personal client information to anyone, for any reason, at any time. Only as permitted or required by law will Promus Advisors disclose client information to nonaffiliated third parties.

INFORMATION WE COLLECT

- **Personal Information:** Name, contact details (email, phone number, address), date of birth, employment information, financial information (income, assets, investment goals), account details, and any other information provided during account opening, communication, or investment advisory process.
- **Transaction Information:** Investment transactions, account balances, and trading activity.
- **Electronic Information:** IP address, browser type, cookies, and other information collected when you access our website or online platforms.

HOW WE USE YOUR INFORMATION

Investment Advisory Services:

To provide investment advice, manage your accounts, analyze your financial situation, and recommend suitable investment strategies.

Client Communication:

To contact you regarding your account, important updates, regulatory disclosures, and marketing communications (if you have opted-in).

Compliance and Risk Management:

To comply with SEC regulations, monitor account activity for potential fraud or suspicious behavior, and manage risk associated with your investments.

Internal Operations:

To maintain client records, improve our services, conduct market research, and develop new products.

SHARING YOUR INFORMATION

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Service Providers:

We may share your personal information with third-party service providers who assist us with our operations, such as custodians, data processors, and marketing vendors, under strict confidentiality agreements.

Regulatory Disclosures:

We may disclose your information as required by law, including government agencies, regulatory bodies, or as part of a legal process.

Affiliated Companies:

In certain situations, we may share your information with affiliated companies for internal business purposes, but only with appropriate safeguards and in compliance with applicable privacy laws.

YOUR PRIVACY CONTROLS

- **Access and Correction:** You have the right to access your personal information and request corrections to inaccurate data by contacting us.
- **Opt-Out:** You can opt-out of receiving marketing communications by contacting us.
- **Privacy Concerns:** If you have any privacy concerns, please contact our designated privacy officer using the contact details below.

DATA SECURITY

We implement reasonable security measures to protect your personal information from unauthorized access, use, disclosure, alteration, or destruction, including physical, electronic, and procedural safeguards.

Incident Response Program:

Promus Advisors incident response program is reasonably designed to detect, respond to, and recover from unauthorized access to or use of customer information.

Promus Advisors will enact the following procedures at the time of the incident:

Assess: Promus Advisors will promptly assess the nature and scope of any incident and will identify the customer information systems and types of customer information that may have been accessed or used without authorization.

Contain and Control: Promus Advisors will take appropriate steps to contain and control an incident to prevent further unauthorized access to or use of customer information.

Notify: Promus Advisors will promptly notify each affected individual whose sensitive customer information was, or is reasonably likely to have been, accessed or used without authorization.

Record of incident. Promus Advisors will memorialize the incident by a report of events to include methods of recovery for the affected individuals, e.g., obtain credit report free of charge, fraud alerts, etc.

Customer Notification Requirements:

Promus Advisors must notify affected individuals whose sensitive customer information was, or is reasonably likely to have been, accessed or used without authorization.

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CHANGES TO THIS POLICY

We may update this Privacy Policy periodically. We will notify you of significant changes through our website or other communication channels.

Contact Information:

If you have any questions about this Privacy Policy, please contact us at: Joshua@promusadvisors.com or 214.612.5750.