Wilsey Asset Management INC
Privacy Policy 2025

Wilsey Asset Management requires our clients provide current and accurate financial and personal information. Wilsey Asset Management will protect the information you have provided in a manner which is safe, secure, and professional. Wilsey Asset Management and its employees are committed to protecting our client's privacy and to safeguarding all information.

Safeguarding Client Documents

We collect non-public client data in checklists, forms, written notations, online, and in documentation provided to us by our clients for investment and consulting services.

During regular business hours' access to client records is monitored, only those with approval may access the files.

Individuals who are not authorized shall not obtain or seek to obtain personal and financial client information. No individual with authorization to access personal and financial customer information shall share information in any manner without the specific consent of a firm principal. Failure to observe Wilsey Asset Management procedures regarding client and consumer privacy will result in discipline and may lead to termination.

Sharing Nonpublic Personal and Financial Information

Wilsey Asset Management is committed to the protection and privacy of its clients' and consumers' personal and financial information. Wilsey Asset Management will not share such information with any affiliated or nonaffiliated third party except:

- When necessary to complete a transaction in a client's account, such as with the clearing firm or account custodians.
- When required to maintain or service a client's account.
- To resolve client disputes or inquiries.
- With persons acting in a fiduciary or representative capacity on behalf of the client.
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants, and auditors of the firm.
- In connection with a sale or merger of Wilsey Asset Management's business.
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability.
- To comply with federal, state or local laws, rules and other applicable legal requirements.
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement.
- In any circumstances with the client's instruction or consent; or
- Pursuant to any other exceptions enumerated in the California Information Privacy Act.

Your Rights:

- Right to Access Information/Correct Inaccurate Information
    - You have the right to request access to information collected about you and information regarding the purposes for which we collect it and the third parties and service providers with which we share it. Additionally, you have the right to correct inaccurate or incomplete information. You may submit such a request as described below.
- Right to Deletion of Information
    - You have the right to request in certain circumstances that we delete any information that we have collected directly from you. You may submit such a request as described below. We may have a reason under the law why we do not have to comply with your request or why we may comply in a more limited way than you anticipated. If we do, we will explain that to you in our response.

- Right to Opt Out of Sale of Information to Third Parties
  - You have the right to opt out of any sale of your information by us to third parties by submitting a request. We do not, however, sell information to third parties for their own direct marketing purposes.
- Right to Opt Out of Targeted Advertising
  - You have the right to opt out of targeted advertising based on your information obtained from your activities over time and across websites or applications. We do not, however, utilize targeted advertising.
- Right to Opt Out of Profiling
  - You have the right to opt out of having your information processed for the purpose of profiling in the furtherance of decisions that produce legal or similarly significant effects concerning you. We do not, however, utilize profiling for these reasons.
- Right to Appeal
  - If we decline to take action in any request that you submit in connection with the rights described in the above sections, you may ask that we reconsider our response by sending an email to the same email box (referenced in section below) from which you receive the decision. You must ask us to reconsider our decision within 45 days after we send you our decision.

Opt-Out Provisions

Wilsey Asset Management does not share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service client accounts or is mandated by law, there are no allowances made for clients to opt out.

Questions? Call 858.224.0004 or email Eladia@wamsd.com.