One Capital Management, LLC
Privacy Policy
April 2025

ONECAPITAL MANAGEMENT, LLC

Privacy Policy

At One Capital Management, LLC we respect your privacy

One Capital Management, LLC and its affiliates (individually and collectively "OCM") has adopted this Privacy Policy with recognition that protecting the privacy and security of the personal information we obtain about our clients is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information.

Information We Collect

We collect certain nonpublic personal identifying information about you (such as your name, address, social security number, phone number, email address, employment information, income, credit references, etc.) from:

(i) information that you provide on applications or other forms
(ii) communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.)
(iii) other various third parties such as business partners, service providers and vendors.

We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

Lastly, we may collect information about how you use our website or otherwise interact with us online automatically, such as IP address, information about your device, browser type, website activity, and other technical information through the use of cookies and/or other similar tracking technologies.

Information We Disclose

We do not disclose the nonpublic personal information we collect about our clients to anyone except:

(i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers etc.);
(ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.);
(iii) our attorneys, accountants, and auditors; or
(iv) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative services on our behalf). These third parties are prohibited to use or share the information for any other purpose. If you decide at some point to either terminate our services or become an inactive client, we will continue to adhere to our Privacy Policy.

Security of Your Information

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards to protect your nonpublic personal information.

Retention of Your Information

We may retain each category of personal information described above as necessary for our legitimate business purposes. The criteria used to determine our retention periods generally include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); and (iii) whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations).

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Sale of Information

We do not sell your personal information to third parties.

Our Use of Cookies and Other Data Collection Technology

Our website may, from time to time, use cookies and similar technologies. A cookie is a small data file that contains a unique identification number that a website stores on your computer when you visit that website. The cookie stores information about your computer, the type of browser you use and how many times your computer visits a certain website. To learn more about cookies generally, visit https://www.allaboutcookies.org/.

Cookies enable us to track how often you and other users visit our website and the specific pages visited and other user actions. You can refuse to use cookies by turning them off in your browser. You do not need to have cookies turned on to use our website. You may, however, find that some areas of the website do not function properly if cookies are disabled.

Links to Other Websites and Services

Our website may include links to third-party webpages and services that are not operated by us. When you click on these links, you will be directed away from our website. A link to a third-party webpage or service does not mean that we endorse it or the quality or accuracy of information presented on it. If you decide to visit a third-party webpage or service, you are subject to its privacy practices and policies, not ours. This Privacy Policy does not apply to any personal information that you provide to third-party webpages or services.

California Privacy Rights

The California Privacy Rights Act ("CPRA") amended the California Consumer Privacy Act ("CCPA") and went into effect on January 1, 2023. As of 2024, for the first time OCM met the threshold to become subject to the CPRA. In accordance with this regulation, OCM has adopted two new policies - CA Privacy Policy and CA Personnel Policy - applicable to California residents and California residents who are employees, applicants and/or candidates of OCM, respectively. California residents, please view our CA Privacy Policy and CA Personnel Policy by visiting https://www.onecapital.com/legal.html and clicking the applicable link.

Changes to Our Privacy Policy

We reserve the right to change this Privacy Policy from time to time.

Questions

If you believe that your nonpublic personal information is not accurate, please contact us. If you have questions about this Privacy Policy, please contact OCM's Compliance Department at compliance@onecapital.com.