

Privacy Policy Notice

FACTS

What does Goodwin Investment Advisory (“GIA”) 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 depends on the product or service you have with us. This information can include, but is not limited to:

- Social Security number and income
- Assets and transaction history
- Investment experience and risk tolerance

When you are *no longer* our client, we continue to share your information as described in this notice.

How?

All financial companies need to share clients’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients’ personal information; the reasons GIA chooses to share and whether you can limit this sharing.

Reasons we can share your personal information	Does GIA 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	yes	no
For our marketing purposes - to offer our products and services to you	no	n/a
For joint marketing with other financial companies	no	n/a
For text messaging purposes - to schedule meetings or appointment reminders	yes	yes
For our affiliates’ everyday business purposes - information about your transactions and experiences	no	n/a
For our affiliates to market to you	no	n/a
For non-affiliates to market to you	no	n/a
For third-party access	no	n/a

To limit our sharing

Please note: If you are a new Client, we can begin sharing your information upon execution of an agreement with GIA. When you are no longer our client, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing. By executing an Investment Advisory Agreement with GIA, the Client agrees to “opt-in” to this privacy policy.

Questions?

call (678) 741-2370 or email teamgia@goodwininvestment.com

Who we are

Who is providing this notice?

Goodwin Investment Advisory, LLC (“GIA”)

SMS Privacy Policy

GIA values your privacy. By subscribing to our SMS notification service, you agree to this privacy policy.

Data Collection	We collect your phone number and name for SMS mobile messaging from you when you become a client of GIA.
Data Usage	Your data is used solely for sending SMS messages. This includes SMS messages for appointment scheduling or appointment reminders.
Data Security	<p>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.</p> <ul style="list-style-type: none">• We take reasonable steps to ensure the confidentiality of client information shared via text messages. However, clients are reminded to avoid including sensitive personal or financial information, such as account numbers or Social Security numbers, in text messages.• We do not share any individual's consent to receive SMS from GIA with third parties.• We do not share phone numbers for SMS purposes or affiliate marketing.
Data Retention	We retain your contact data for the duration of your agreement with GIA, and as required by applicable laws and regulations. You may request deletion at any time.
Opt Out	Reply STOP to any message to unsubscribe.
Non-Sharing Clause	We do not share your information with third parties for marketing purposes. Your information is only shared with our SMS provider for secure messaging.

What we do

How does GIA 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.
How does GIA collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none">• open an account or give us contact information• seek advice about your investments• tell us about your investment or retirement portfolio• enter into an investment adviser contract <p>To ensure compliance and protect client information, all text message communications are conducted using firm-approved, secure communication platforms that are monitored and archived in accordance with regulatory requirements.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none">• sharing for affiliates' everyday business purposes—information about your creditworthiness• affiliates from using your information to market to you• sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What does our website track?	<p>With the use of Google Analytics and Cookies, we track activity on our website. Google may use the collected data to contextualize and personalize the ads of its own advertising network.</p> <ul style="list-style-type: none">• You can opt-out of having made your activity on the service available to Google Analytics by installing the Google Analytics opt-out browser add-on. <p>Cookies are issued to track analytics:</p> <ul style="list-style-type: none">• Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. <p>We may also use trusted third party services that track this information on our behalf.</p>

Definitions & Terms

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none">• Timothy Goodwin is the owner of MCSE Stewardship, LLC and is the majority owner of Goodwin Investment Advisory, LLC. MCSE Stewardship, LLC is the general partner of private funds, Goodwin Real Estate Fund, LP and Goodwin Real Estate Fund II, LP.• No mobile information including Personally Identifiable Information (PII) or SMS consent will be shared with third parties/affiliates for marketing/promotional purposes.
Non-Affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none">• No mobile information including Personally Identifiable Information (PII) or SMS consent will be shared with third parties/non-affiliates for marketing/promotional purposes.
Third-Party Access	<p>Non-affiliated companies are third-party entities that are not under common ownership or control with GIA and do not share a corporate relationship. In the context of SMS communications, these companies may include SMS gateway providers, mobile carriers, third-party messaging platforms, and vendors that support multi-factor authentication (MFA). While these entities may transmit, process, or store SMS messages on behalf of the adviser, they operate independently and are not affiliated with GIA.</p> <ul style="list-style-type: none">• We do not share your information with third parties for marketing purposes. Your information is only shared with our SMS provider for secure messaging.
Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none">• No mobile information including Personally Identifiable Information (PII) or SMS consent will be shared for joint marketing/promotional purposes.

Other Important Information

By signing the Client Advisory Agreement with GIA, I acknowledge that I have fully read and understand this Privacy Policy and opt-in as outlined above. I understand that if I have any questions or concerns about this policy, it is my responsibility to discuss this with my financial professional.

SMS Terms of Service

By opting into SMS through signing the Client Advisory Agreement with GIA, you are agreeing to receive SMS messages from GIA. This includes SMS messages for appointment scheduling or appointment reminders. Message frequency varies. Message and data rates may apply. Reply STOP to any message to opt out. We reserve the right to revise this policy from time to time without prior notice. You will be notified of any material changes either by email or by a conspicuous posting on our website:

www.goodwininvestment.com