

Privacy Policy

Apollo Wealth Management, LLC

The Firm takes precautions to maintain the privacy of personal information concerning the Firm's current and prospective individual investors. These precautions include the adoption of certain procedures designed to maintain and secure such investors' nonpublic personal information from inappropriate disclosure to third parties. Federal regulations require the Firm to inform investors of this privacy policy.

The Firm collects nonpublic personal information about its investors from the following sources:

- Information the Firm receives from an investor in an application or other forms to open an account or other related documents or forms;
- Information about an investor's transactions with the Firm, its affiliates, or others, including service providers that are necessary to carry on our everyday business; and
- Information the Firm may receive from a consumer reporting agency.

The Firm does not disclose any nonpublic personal information about its prospective, existing or former investors to anyone, except to service providers that have been advised as to proper handling of the information and otherwise as permitted or required by law and regulation.

The Firm restricts access to nonpublic personal information about its investors to those employees and agents of the Firm who have been advised as to the proper handling of such information and who need to know that information in order to provide services to its investors. The Firm may also disclose such information to its affiliates and to service providers and financial institutions that provide services to the Firm that are necessary or appropriate for the administration of the Firm and the effectuation of its transactions or are otherwise permitted by law, such as prime brokers and administrators. The Firm will require such third-party service providers and financial institutions to protect the confidentiality of the investors' nonpublic personal information and to use the information only for purposes for which it is disclosed to them. The Firm may also disclose nonpublic personal information to regulatory authorities as required or permitted by applicable law. The Firm maintains physical, electronic, and procedural safeguards that comply with federal standards to safeguard the investors' nonpublic personal information and which the Firm believes are adequate to prevent unauthorized disclosure of such information.

The Firm does not otherwise provide information about current, former and prospective investors to outside firms, organizations or individuals except at the investor's request or to attorneys, accountants and auditors of any current, former and prospective client.

If you have any questions concerning this privacy policy, please contact Bill at Apollo at 716-783-1610.

FACTS**WHAT DOES APOLLO WEALTH MANAGEMENT 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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ■ Social Security number and Name ■ Home Address and Phone Number ■ Date of Birth and Account Balances <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
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 Apollo Wealth Management chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Apollo Wealth Management 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	No
For joint marketing with other financial companies	No	N/A
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	N/A
For our affiliates to market to you	No	N/A
For nonaffiliates to market to you	No	N/A

Questions?	Call 716-783-1610 or go to our website.
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Who we are

Who is providing this notice?

Apollo Wealth Management

What we do

How does Empirical Wealth Mgmt 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 Empirical Wealth Mgmt collect my personal information?

We collect your personal information, for example, when you

- open an account or deposit/withdraw funds
- create a financial plan or use your investor checking account
- use your linked credit or debit card

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.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

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Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

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Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

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Other important information

Apollo Wealth Management is required by federal regulations (SEC Regulation S-P, 17 CFR 284.30) to adopt certain procedures designed to protect all Client confidential and nonpublic information and to safeguard personal information contained in both paper and electronic records. This notice (the "Privacy Notice") is designed to meet the standards set forth in the federal regulations as well as the Commonwealth of Massachusetts Standards for Protection of Personal Information (to the extent that such standards are applicable). For purposes of this Privacy Notice, the term Client includes, where appropriate, investors affiliated with Apollo Wealth Management.