Augēo Wealth Management, LLC

Privacy Policy

3 Stonemeadow Drive • Westwood, MA 02090 • (781) 801-0575 • walter@augeowealth.com • www.augeowealth.com
Firm IARD No. 341437 • IAR CRD No. 2454174
Massachusetts Registered Investment Adviser
Effective Date: April 2026 • Revised: October 2026

This Privacy Policy is provided to each client at the commencement of the advisory relationship and annually thereafter, in accordance with the firm's obligations under 950 CMR 12.205(9)(c)13. It describes how Augēo Wealth Management collects, uses, safeguards, and may share your non-public personal information.

1. Introduction and Scope

Augēo Wealth Management, LLC ("we," "our," or "the Firm") is registered as an investment adviser under the laws of the Commonwealth of Massachusetts (Firm IARD No. 341437; IAR CRD No. 2454174). We are committed to protecting the privacy and confidentiality of our clients' non-public personal information ("NPI"). This Privacy Policy applies to all current and former clients and to all NPI we collect or maintain in connection with advisory services.

2. Massachusetts Privacy Standard — Opt-In Requirement

> Augēo Wealth Management does not disclose client NPI to a non-affiliated third party unless disclosure is required by law or the client has provided the affirmative written opt-in authorization required by Massachusetts law. Because certain advisory services use non-affiliated custodial and technology providers (see Section 5.2), the Firm obtains the applicable opt-in authorization before transmitting NPI to those providers.

This standard derives from 950 CMR 12.205(9)(c)13, which prohibits a state-registered investment adviser from disclosing the identity, affairs, or investments of any client to any non-affiliated third party unless required by law or the client affirmatively consents in writing. This is stricter than the federal Gramm-Leach-Bliley Act, which permits sharing subject to an opt-out right. Massachusetts law requires an affirmative opt-in.

3. Information We Collect

In the course of providing advisory services, we collect and maintain the following categories of NPI:

Category	Examples
Identification	Full legal name, date of birth, SSN/TIN, government-issued ID, contact information.
Financial Information	Account balances, income and net worth, holdings, account numbers, brokerage statements, tax documents.
Investment Profile	Risk tolerance, investment objectives, time horizon, liquidity needs, and investment restrictions.
Financial Planning Information	Retirement projections, cash flow analyses, insurance details, estate planning documents, beneficiary designations.
Transaction Information	Securities transaction records, fee calculations, billing records, and custodian statements.
Communications	Records of written, electronic, and telephone communications.

We collect this information directly from clients, from publicly available sources, and from the qualified custodian (Schwab Advisor Services). We do not collect NPI from consumer reporting agencies or data brokers.

4. How We Use Your Information

We use client NPI solely for: providing advisory services; compliance and recordkeeping; fee calculation and billing per 950 CMR 12.205(5)(b); client communications; and responding to legal or regulatory obligations. We do not use client NPI for marketing to unaffiliated third parties or for sale to data aggregators.

5. Information Sharing

5.1 We Do Not Sell Client Information. Augēo Wealth Management does not sell, rent, license, or otherwise transfer client NPI to any third party for any commercial purpose.

5.2 Sharing with Service Providers. The following non-affiliated service providers may receive client NPI solely to the extent necessary to deliver the services described. Because each is a non-affiliated third party under Massachusetts law, the Firm obtains the client's prior signed opt-in authorization before disclosing NPI to each provider. A signed authorization is obtained at onboarding identifying each provider, the specific categories of NPI authorized for disclosure, the purpose of each disclosure, and the duration of authorization:

Provider	Function	Affiliated?	Opt-In Required?	NPI Categories Authorized
Schwab Advisor Services	Custody, brokerage, and fee processing	No	Yes	Client identification and contact info, account data, investment objectives, holdings, transactions, fee calculations and billing info
RightCapital	Financial planning software	No	Yes	Identification and contact info, income, assets, liabilities, tax info, insurance data, goals and financial planning data
Wealthbox	Client relationship management (CRM)	No	Yes	Identification and contact info, client communications, meeting notes, tasks and relationship records
Smartria	Compliance management and personal trading logs	No	Yes	Identification info, advisory-account info, personal trading records, compliance documentation
DocuSign	Electronic signatures on client documents	No	Yes	Identification and contact info, documents selected for electronic signature
Client-selected CPA, attorney, or insurance professional	Professional coordination per financial plan	No	Yes	Identification and contact info, and financial planning info Client specifically authorizes
Massachusetts Securities Division / regulators	Required by law or regulation; legal process	No	N/A — legally required	

5.3 No Sharing for Marketing or Other Purposes. Augēo does not share client NPI with non-affiliated third parties for marketing, referral, product promotion, or any other purpose not described in Section 5.2. When referring clients to professionals (CPAs, attorneys, insurance agents), we do not transmit client NPI without prior signed opt-in authorization.

5.4 Opt-In Authorization. The opt-in form presented at onboarding identifies: (a) each specific non-affiliated provider; (b) the specific categories of NPI to be shared; (c) the purpose of each disclosure; and (d) the period during which each authorization remains in effect. Unless a shorter period is stated, each service-provider authorization remains effective for the duration of the advisory relationship or until revoked in writing, whichever occurs first. You may revoke any authorization at any time by written notice sent to walter@augeowealth.com or 3 Stonemeadow Drive, Westwood, MA 02090. Revocation is effective prospectively and does not affect disclosures lawfully made in reliance on the prior authorization.

6. How We Safeguard Your Information

- Physical Security: Client files and documents are maintained in secured storage at the firm's principal office, accessible only to authorized firm personnel.
- Device and Data Encryption: Electronic devices used to store or transmit NPI are encrypted. Portable storage media are encrypted or stored in secured locations.

- Access Controls and Authentication: Access to firm systems requires strong passwords and multi-factor authentication. Access privileges are limited to the minimum necessary.
- Secure Communications: NPI transmitted electronically is sent using encrypted channels. Unsecured email is not used for sensitive NPI such as Social Security numbers or account numbers.
- Software Maintenance: Firm devices and software are maintained with current security patches. Reputable endpoint security software is installed on all firm devices.
- Data Backup: Client records are backed up regularly to a secure, encrypted cloud-based location.
- Incident Response: In the event of a security incident compromising client NPI, we will notify affected clients promptly and take appropriate remedial action. The Firm maintains an internal Written Information Security Program (WISP) consistent with 201 CMR 17.00.

7. Retention of Client Information

We retain client NPI for the period required by applicable law. Under Rule 204-2 under the Investment Advisers Act of 1940 and Massachusetts securities regulations, records must generally be retained for a minimum of five years from the end of the fiscal year in which they were created, with the first two years in an easily accessible location. Records are securely destroyed following the applicable retention period.

8. Former Clients

We extend the same privacy protections to former clients. We do not share former-client NPI with non-affiliated third parties for any purpose other than those described in Section 5.2.

9. Annual Privacy Notice

We will provide each current client with a copy of this Privacy Policy annually. If there are material changes, we will notify you promptly. The current version is always available upon request by contacting Walter Garbacik at (781) 801-0575 or walter@augeowealth.com.

10. Your Rights

- Access: You may request a copy of the NPI we maintain about you at any time.
- Correction: You may request correction of any inaccurate or incomplete NPI we hold.
- Opt-In Revocation: You may revoke any opt-in authorization at any time by written notice to walter@augeowealth.com. Revocation is effective prospectively and does not undo disclosures already lawfully made.
- Questions and Complaints: Contact Walter Garbacik at (781) 801-0575 or walter@augeowealth.com, or file a complaint with the Massachusetts Securities Division at One Ashburton Place, 17th Floor, Boston, MA 02108, (617) 727-3548.

11. Contact Information

Walter Garbacik, Chief Compliance Officer and Privacy Officer

Augēo Wealth Management, LLC • 3 Stonemeadow Drive, Westwood, MA 02090

(781) 801-0575 • walter@augeowealth.com

This Privacy Policy is issued pursuant to 950 CMR 12.205(9)(c)13 and the Massachusetts Securities Division's published guidance on the opt-in privacy requirement for state-registered investment advisers.

Privacy Policy — Client Acknowledgment and Service-Provider Opt-In Authorization

Part A — Acknowledgment of Receipt

By signing below, I/we acknowledge that I/we have received, read, and understood the Augēo Wealth Management Privacy Policy, Revised July 2026, and that:

- Augēo Wealth Management will not disclose my/our NPI to any non-affiliated third party unless required by law or I/we have provided a prior affirmative written opt-in authorization.
- A separate opt-in authorization (Part B below) is required before the Firm may share NPI with custodial and technology service providers in connection with advisory services.
- I/we may revoke any opt-in authorization at any time by written notice to walter@augeowealth.com. Revocation is effective prospectively and does not undo disclosures already lawfully made.
- A current copy of the Privacy Policy is available from Walter Garbacik at (781) 801-0575 or walter@augeowealth.com.

Client(s) / Joint Client (if applicable)

Signature: _____

Print Name: _____

Date: _____

Joint Client (if applicable)

Signature: _____

Print Name: _____

Date: _____

Part B — Affirmative Service-Provider Opt-In Authorization

This section authorizes Augēo Wealth Management to disclose the minimum NPI necessary to the following non-affiliated service providers for the stated purposes. Please initial next to each provider you authorize. You may authorize some and decline others; however, declining authorization for Schwab Advisor Services will prevent the Firm from providing portfolio management services.

□ I/we authorize disclosure to: **Schwab Advisor Services**
Purpose: Custody, fee processing, account statements, and trade execution
Information authorized for disclosure: Client identification and contact info, account data, investment objectives, holdings, transactions, fee calculations and billing info
Client initials: _____ Date: _____

□ I/we authorize disclosure to: **RightCapital**
Purpose: Financial planning analysis and projections
Information authorized for disclosure: Identification and contact info, income, assets, liabilities, tax info, insurance data, goals and financial planning data
Client initials: _____ Date: _____

□ I/we authorize disclosure to: **Wealthbox**
Purpose: Client relationship management and communications
Information authorized for disclosure: Identification and contact info, client communications, meeting notes, tasks and relationship records
Client initials: _____ Date: _____

□ I/we authorize disclosure to: **Smartria**
Purpose: Compliance recordkeeping
Information authorized for disclosure: Identification info, advisory-account info, personal trading records, and compliance documentation
Client initials: _____ Date: _____

□ I/we authorize disclosure to: **DocuSign**
Purpose: Electronic execution of client documents
Information authorized for disclosure: Identification and contact info and documents selected for electronic signature
Client initials: _____ Date: _____

□ I/we authorize disclosure to: **Client-designated CPA, attorney, or insurance professional (specify below)**
Purpose: Professional coordination per financial plan
Information authorized for disclosure: Identification and contact info, and financial planning info Client specifically authorizes for the named professional
Client initials: _____ Date: _____

If applicable, identify any additional non-affiliated professional you authorize the Firm to coordinate with:

Third Party Name	_____
Relationship to Client	_____
Information to be Shared	_____
Purpose of Disclosure	_____
Duration of Authorization (if limited)	_____

Unless a shorter period is stated above, each service-provider authorization in Part B remains effective for the duration of the advisory relationship or until revoked in writing, whichever occurs first.

By signing below, I/we affirmatively authorize only the disclosures individually selected and initialed above.

Part B — Client Signature

Client(s) / Joint Client (if applicable)

Signature: _____
Print Name: _____
Date: _____

Joint Client (if applicable)

Signature: _____
Print Name: _____
Date: _____

Retain one signed copy for your records. The Firm retains one signed copy in the client's file.