# PRIVACY POLICY NOTICE

## MGO One Seven LLC
## d/b/a: MGO One Seven

**October 1, 2023**

MGO One Seven takes client privacy and information security seriously. Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.

**Information We Collect:** We collect certain nonpublic information about our clients ("Customer Information") to allow us to provide advisory services to you. We collect this information when you open an account, tell us about your investment or retirement portfolio, or seek advice about your investments. We also collect your personal information from third parties such as credit bureaus and other companies. Customer Information we collect can include:

- Personal and household information about income, spending habits, investment objectives, financial goals, statements of account, and other records concerning your financial condition and assets, information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Identifying information such as your name, age, address, social security number, etc.
- Information about your accounts and/or transactions with us or others (*e.g.*, broker-dealers, clearing firms, or investment sponsors).
- Information we receive from consumer reporting agencies (*e.g.*, credit bureaus)
- Other information we collect to provide an appropriate recommendation, complete a transaction or fulfill a service request.

**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 that comply with applicable federal or state standards to protect your nonpublic personal information. When you are no longer our client, we will continue to hold your information and share it as described in this notice.

**Information We Disclose:** All financial companies need to share customers' personal information to run their everyday businesses. The section below lists the reasons why financial services companies can share their clients' personal information, the reasons MGO One Seven shares personal information, and whether you can limit this sharing.

| **Reason For Sharing** | **Does MGO One Seven share?** | **Can you limit this sharing?** |
|---|---|---|
| For our everyday business purposes, such as to process your transactions, maintain your accounts, respond to court orders and legal or regulatory requests or investigations, report to credit bureaus, consult with our attorneys or auditors, or as permitted by law | Yes | No |
| For our marketing purposes to offer additional services to you | Yes | No |
| For our affiliates' everyday business purposes - information about your | Yes | No |

| | | |
|---|---|---|
| transactions and experiences | | |
| For our affiliates' everyday business purposes - information about your creditworthiness | No | We don't share |
| For joint marketing with other financial companies | No | We don't share |
| For non-affiliates to market to you<br><br>** If your financial professional terminates his or her relationship with us and moves to another investment advisory or brokerage firm, we or your financial professional may disclose your personal information to the new firm, unless you instruct us not to by returning the completed Departing Financial Professional Opt-Out form attached to this notice. We do not otherwise share your information with non-affiliates to enable them to market to you.* | Yes* | Yes |

**Why you cannot limit all sharing:** Federal law gives you the right to limit only sharing for affiliates' business purposes (information about your creditworthiness), or for affiliates or non-affiliates to market to you. State laws may give you additional rights to limit sharing.

> Information for California, North Dakota and Vermont clients: To comply with applicable state law, if the mailing address for your account is in California, North Dakota or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for their marketing purposes except as permitted by applicable state law.

**What happens when you limit sharing for an account you hold jointly with someone else?** Your choices will apply to everyone on your account.

**Definitions:** An affiliate is a company that is related to MGO One Seven by common ownership or control; it can be a financial service provider or a non-financial company. A non-affiliate is a company not related to MGO One Seven by common ownership or control; it can be a financial service provider or a non-financial company. Joint marketing entails a formal agreement between non-affiliated financial companies that together market financial products or services to you.

**Changes to Our Privacy Policy:** If we make a material change to our privacy policy regarding how we use your confidential information, we will provide written notice to you. Where applicable, you will be given an opportunity to limit or opt-out of the disclosure arrangements.

**Questions:** If you have questions about this privacy notice or about the privacy of your customer information call 888-MOSKAL2 or 216-771-4242 and ask to speak to the Chief Compliance Officer.

# MGO One Seven

## Departing Financial Professional Opt-Out Form

If you work with a financial professional who moves to a new investment advisor or to a brokerage firm, we are permitted to share your information with your professional's new firm unless you opt out or unless otherwise prohibited by law.

If you would like to limit the personal information that your financial professional could disclose or take if he or she moved to another investment advisor or to a brokerage firm and terminated the relationship with MGO One Seven, please complete and mail this form to:

MGO One Seven
Attn: CCO
24400 Chagrin Blvd., Suite 310
Beachwood, OH 44122

If your primary address is in a state that requires your affirmative consent to share your personal information with the new firm, then you must give your written consent before we will allow your financial professional to take your personal information to the new firm. Please speak with your financial professional about how to provide your written consent.

MGO One Seven is a member of the Protocol for Broker Recruiting. So long as we remain a member of the Protocol when your financial professional terminates his or her relationship with our firm, then MGO One Seven will permit your financial professional to take the information permitted by the Protocol (currently, your name, address, phone number, email address and the account title of the accounts serviced) if your financial professional joins another firm that is a Protocol member. Your financial professional may retain and take this information and may share it with the new firm even if you have exercised your right to limit information sharing as described above.

For joint account owners, the privacy choices made by any account holder apply to all joint holders relating to the account.

I HEREBY INSTRUCT MGO ONE SEVEN TO LIMIT THE PERSONAL INFORMATION ABOUT ME THAT MY FINANCIAL PROFESSIONAL COULD DISCLOSE OR TAKE IF HE OR SHE MOVES TO A NEW INVESTMENT ADVISOR OR TO A BROKERAGE FIRM AND TERMINATES THE RELATIONSHIP WITH MGO ONE SEVEN; I UNDERSTAND THAT MGO ONE SEVEN MAY NONETHELESS DISCLOSE MY NAME, ADDRESS, TELEPHONE NUMBER, EMAIL AND TITLE OF THE ACCOUNTS SERVICED BY MY FINANCIAL PROFESSIONAL TO THE NEW FIRM AS ALLOWED UNDER FEDERAL AND CERTAIN STATE LAWS AND THE PROTOCOL FOR BROKER RECRUITING.

Name: _____
Street Address: _____
City: _____ State: ____ ZIP Code: _____
Name of your financial professional: _____
Signature: _____
Date: _____