

Schultz Financial Group Incorporated - Cookie and Tracking Technologies Policy

Last updated: July 21, 2026

1. **Purpose.** This Cookie and Tracking Technologies Policy (this “Policy”) describes how Schultz Financial Group Incorporated (“the Firm,” “we,” “us,” or “our”), a registered investment adviser, uses cookies and similar tracking technologies on <https://sfginc.com> (the “Website”). Where required, the Firm obtains your consent before deploying non-essential cookies or similar tracking technologies. It applies to visitors to the public-facing Website. This Policy supplements, but does not replace, the Firm’s Privacy Policy issued under Regulation S-P and the Gramm-Leach-Bliley Act, a copy of which is available at <https://sfginc.com/wp-content/uploads/2026/06/2026-06-01-SFG-Privacy-Notice.pdf> which governs the Firm’s collection and use of nonpublic personal information (“NPI”) about advisory clients and prospective clients obtained in the course of the advisory relationship.

2. **Information We Collect.** We collect two kinds of information through the Website:

- **Information You Provide to Us:** when you contact us or interact with forms on the Website, you may choose to give us information such as your name and email address (for example, when you email us at info@sfginc.com, submit a contact form, or request an introductory call) and any message content or details you choose to include.
- **Information Collected Automatically:** when you visit the Website, certain information is collected automatically through cookies and similar technologies, subject to your consent choices. This information is aggregated where practicable and used to understand and improve how visitors use the Website. This information may include:
 - o Your IP address, browser type and device information,
 - o Pages viewed, referring pages, and general usage patterns.

3. **Cookies and Tracking Technologies.** Cookies are small text files placed and stored on a device when a visitor uses the Website to help it function and understand how it is used. “Similar technologies” might include web beacons/pixels, local storage objects, software development kits (SDKs), session-replay and heatmap scripts, live-chat widgets, and server-side tags. Some of these technologies can capture mouse movement, keystrokes, form-field entries, and page interactions.

4. **Categories of Cookies Used on the Website.** The table below describes the cookies and tracking technologies the Website uses.

- **Strictly Necessary Cookies** are required for the Website to function and for security, and load before you make a choice.
- **Analytics and Marketing Cookies** load only after you consent through the cookie banner. You can decline these, and you can change your choices at any time using the cookie banner.

Cookie names, providers, and durations are set by the third-party providers and may change. You can also control cookies through your browser settings; disabling strictly necessary cookies may affect how the Website functions.

Cookie/Technology	Provider	Category	Purpose	Loads	Duration
__cf_bm	Cloudflare	Strictly necessary	Bot mitigation and security for the Website’s infrastructure	Before consent	~30 minutes
cookieyes-consent	CookieYes	Strictly necessary	Records your cookie-consent preferences	Before consent	~1 year

_ga	Google Analytics 4	Analytics	Distinguishes unique visitors	After consent only	~2 years
_ga_910VF6TLVL	Google Analytics 4	Analytics	Maintains analytics/session state for the Website's GA4 property	After consent only	~2 years
_gid	Google Analytics	Analytics	Distinguishes visitors (short-term)	After consent only	~24 hours
_gat	Google Analytics	Analytics	Limits the rate of analytics requests	After consent only	~1 minute
__smVID	Sumo (SumoMe)	Marketing	Identifies visitors for Sumo's on-site email/list-building tools	After consent only	~2 years
accessiBe widget ('acsbapp.com')	accessiBe	Accessibility	Stores accessibility display preferences for the accessibility widget	With the accessibility widget	Session / local storage

5. Cookies and Nonpublic Personal Information. Tracking technologies on the Website are not used to collect Social Security numbers, account numbers, or other NPI. Analytics and session-replay tools (if used) are configured to mask or exclude any authenticated pages of the client portal and any form fields that request NPI. Any vendor with access to Website data that could indirectly identify a client or prospective client is treated as a service provider under the Firm's Regulation S-P information security program and is subject to the same vendor due diligence, confidentiality, and breach-notification obligations that apply to the Firm's other service providers.

6. Consent Mechanism. This Website uses a consent management platform, "CookieYes," that displays a cookie banner and blocks non-essential cookies until you opt in.

7. Third-Party Tools and Vendors. The Website relies on the following categories of third-party service providers, which may process limited visitor information to perform their functions:

- Hosting and infrastructure— the Website is hosted on Kinsta and served through Cloudflare and is built on WordPress;
- Analytics — Google Analytics 4 (loads only after consent). See Section 8 for additional information;
- Marketing / list-building — Sumo (loads only after consent);
- Accessibility — accessiBe, which provides the Website's accessibility widget; and
- Consent management — CookieYes, which manages the cookie banner and consent records.

We disclose information collected through the Website to these providers only as needed for them to perform their services, and we may disclose information where required by law, regulation, or legal process, or to protect our rights and the security of the Website.

We do not sell your personal information or disclose it to third parties for their own marketing purposes.

8. Google Analytics. The Website uses Google Analytics 4 to understand, in aggregate, how visitors use the site. Google Analytics loads only after you consent through the cookie banner. Google may use the data collected in accordance with its own policies. You can learn how Google uses information at <https://policies.google.com/technologies/partner-sites>, and you can opt out of Google Analytics across websites using Google's browser add-on at <https://tools.google.com/dlpage/gaoptout>.

9. California Residents – Your Privacy Rights. This Section applies to California residents to the extent the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, the "CCPA"), applies to the Firm's collection and use of personal information through the Website.

Notice at Collection. Through the Website, the Firm may collect identifiers, such as name, email address, IP address, and online identifiers; internet or other electronic network activity information, such as pages viewed, referring pages, browser type, device information, and general Website usage; and the content of communications or forms that you choose to submit. The Firm collects this information directly from you and automatically through your browser, device, cookies, and similar technologies.

The Firm uses this information to respond to inquiries and requests; operate, secure, maintain, and improve the Website; understand Website usage; and comply with legal and recordkeeping obligations. The Firm discloses it to service providers and contractors that support Website hosting, security, analytics, consent management, accessibility, and related functions, as described in Sections 7 and 8.

The Firm retains personal information only for as long as reasonably necessary for these purposes, including applicable legal, regulatory, recordkeeping, and security requirements. Cookie durations are described in Section 4.

If you are a California resident, you have the right to:

- know what categories of personal information we have collected about you and how it is used and disclosed;
- request access to, or a copy of, the specific personal information we have collected;
- request correction of inaccurate personal information;
- request deletion of personal information we have collected, subject to legal exceptions;
- opt out of the "sale" or "sharing" of personal information; and
- not be discriminated against for exercising your privacy rights.

We do not sell or share (as those terms are defined under the CCPA/CPRA) the personal information of Website visitors, and we do not use or disclose sensitive personal information for purposes that would require an opt-out.

To exercise any of these rights, contact us using the details in Section 11. We will verify your request as required by law before responding, and we will not discriminate against you for exercising your rights. You may authorize an agent to make a request on your behalf.

10. Changes to This Policy. We may update this Policy from time to time. If we do, we will revise the "Last updated" date at the top of this Policy. Material changes will be reflected on this page, and we encourage you to review it periodically.

11. Contact. If you have questions about this Policy or wish to exercise a privacy right, please contact: Schultz Financial Group Incorporated, Attn: Jennifer Specter, Chief Compliance Officer

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