

## Privacy Policy

Effective Date: March 6, 2026 | Supersedes all prior versions

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### Our Commitment to You

Parrillo Investors LLC ("Parrillo Investors," "the Firm," "we," "our," or "us") is committed to safeguarding the privacy and security of the personal information of our clients and prospective clients. This Privacy Policy describes how we collect, use, and protect your personal information in connection with our investment advisory services and our publicly available analytical tools, including our interactive investor assessment.

We do not sell your personal information to any third party. We do not share it except as described in this policy or as required by law.

### Information We Collect

We may collect the following categories of personal information:

Category	Examples
Identity information	Name, age, household status, employment status
Contact information	Email address, phone number, mailing address
Financial information	Portfolio size range, investment horizon, liquidity needs
Behavioral assessment data	Responses to risk scenario questions, PI Risk Score, loss aversion coefficient
Usage information	Pages visited, tool interactions (via Google Analytics — anonymized)

**Interactive Assessment Tool.** Our investor assessment tool does not require you to provide your name or email address to complete the assessment or receive your results. If you voluntarily submit your name and email at the end of the assessment, that information is collected solely for the purpose of following up with you about your results and the possibility of an advisory engagement. You may decline to provide this information without affecting your access to the assessment or your results.

### How We Use Your Information

We use personal information we collect for the following purposes:

- To provide investment advisory services pursuant to a written Investment Advisory Agreement

- To respond to inquiries and schedule consultations
- To send you your assessment report if you have requested it
- To communicate with you about our services, where you have consented to receive such communications
- To comply with applicable legal and regulatory obligations, including SEC and state investment adviser regulations
- To maintain required books and records under Rule 204-2 of the Investment Advisers Act of 1940

We do not use your personal information for purposes incompatible with those described above without your consent.

### **Information We Do Not Share**

We do not sell, rent, or trade your personal information to any third party. We do not share your personal information with unaffiliated third parties except:

- As necessary to provide services you have requested (for example, sharing information with a custodian you have selected)
- As required by applicable law, regulation, legal process, or governmental authority
- To protect the rights, property, or safety of Parrillo Investors LLC, our clients, or others
- With your explicit consent

Parrillo Investors LLC does not have affiliated companies or referral arrangements that would result in the sharing of your information for marketing purposes.

### **Data Security**

We maintain physical, electronic, and procedural safeguards designed to protect your personal information from unauthorized access, use, or disclosure. Access to personal information is restricted to authorized personnel who need it to perform their responsibilities.

The interactive assessment tool does not transmit your assessment responses to our servers unless you voluntarily submit your name and email address. If you do not submit the opt-in form, no personal data from your session is retained by the Firm.

### **Analytics and Cookies**

Our website ([parrilloinvestors.com](http://parrilloinvestors.com)) uses Google Analytics to collect anonymized data about website traffic and usage patterns. This data does not identify individual visitors and is used solely to understand how our website is being used. You may opt out of Google Analytics data collection by installing the Google Analytics Opt-out Browser Add-on available at [tools.google.com/dlpage/gaoptout](http://tools.google.com/dlpage/gaoptout).

### **Your Rights**

You may request access to, correction of, or deletion of personal information we hold about you by contacting us at the address below. We will respond to such requests within a reasonable time and in

accordance with applicable law. Note that we are required to retain certain records under Rule 204-2 of the Investment Advisers Act and may be unable to delete information subject to those retention requirements.

### **Regulatory Disclosure**

Parrillo Investors LLC is a registered investment adviser in the Commonwealth of Virginia and the State of Colorado. Our Form ADV Part 2A (Firm Brochure), which describes our business practices, fees, and conflicts of interest, is available at [parrilloinvestors.com/disclosures](http://parrilloinvestors.com/disclosures) and upon request. Our Form ADV includes additional privacy disclosures required under Regulation S-P.

### **Changes to This Policy**

We may update this Privacy Policy from time to time to reflect changes in our practices or applicable law. The effective date at the top of this document will be updated accordingly. We encourage you to review this policy periodically.

### **Contact Us**

Parrillo Investors LLC

Andrew Parrillo, Managing Member

Williamsburg, Virginia

[parrilloinvestors.com](http://parrilloinvestors.com)

Registered Investment Adviser — Virginia & Colorado