



WAVERLY

ADVISORS

PRIVACY POLICY

Investment advisory services are offered by Waverly Advisors, LLC ("Waverly"), an investment adviser registered with the Securities and Exchange Commission.

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FACTS

WHAT DOES Waverly Advisors, LLC 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?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: Contact (name, email address, residential mailing/physical address, and phone numbers); Identification (SS number, tax id number, state/local id card number, or date of birth); Profile (login credentials to our client portal or other accounts, investment risk tolerance, preferences, objectives and experience, biographical details (education, employer), interests, family member data, estate plan documents; Financial (income, net worth, tax, investment related data); Marketing; and Payment info.
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 Waverly Advisors, LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Waverly Advisors, LLC share?	Can you limit this sharing?
For our everyday business purposes – such as to process clients' transactions, open or maintain clients' accounts, respond to court orders and investigations by governmental bodies or self-regulatory organizations, or report to credit bureaus.	Yes	No
For our marketing purposes –to offer our products and services to clients.	Yes	No
For joint marketing with other financial companies	No	We don't share
For our Affiliates' everyday business purposes –information about clients' transactions and experiences.	Yes	No
For our Affiliates' everyday business purposes –information about clients' credit worthiness.	No	We don't share
For our Affiliates to market to clients.	No	We don't share
For our Non-Affiliates to market to clients.	No	We don't share

Who we are

Who is providing this notice?

Waverly Advisors, LLC

What we do

How does Waverly Advisors, LLC 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.

For example, measures include certain employee access restrictions, revocation of employee access to personal information upon termination of employment, delivery of sensitive information to clients via secure channels (for example, encrypted email, security shard folder or client portal), and physical office security procedures.

How does Waverly Advisors, LLC collect my personal information?

We collect your personal information, for example, when you open an account or deposit money.

Other sources of information include:

from clients on applications or other forms;

from paper statements or via electronic download directly from clients' custodian;

from third parties in connection with services we provide, such as planning, trading and portfolio analysis software, platforms and tools;

from activity on our website, such as data in contact forms, information request forms, website navigation;

from "cookies" or similar files or scripts.

We also may collect your personal information from others, such as affiliates or other companies in which clients make investments.

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. Some states have passed their own laws regarding data privacy, which have certain rights around our collection, use, and sharing of your personal information. Please send any request for information or request to limit sharing via email to info@waverly-advisors.com or contact Markus Sleuwen, Chief Compliance Officer via phone at (205) 871-3334.

Definitions

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Other Important Information

This Policy, and Waverly's collection and use of client information, shall be governed and interpreted in accordance with the laws of the United States and the State of Alabama. Please direct any request for a copy of this Privacy Policy to Waverly via email at info@waverly-advisors.com, or any questions about the privacy and protection of personal information to Markus Sleuwen, Chief Compliance Officer, via phone at (205) 871-3334.