



**FACTS: WHAT DOES WAVERLY ADVISORS, LLC DO WITH YOUR PERSONAL INFORMATION?**

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| <b>WHY?</b>  | 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.   |
| <b>WHAT?</b> | <p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Contact (name, email address, residential mailing/physical address, and phone numbers)</li> <li>• Identification (SS number, tax id number, state/local id card number, or date of birth);</li> <li>• 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;</li> <li>• Financial (income, net worth, tax, investment related data);</li> <li>• Marketing; and</li> <li>• Payment info.</li> </ul> <p>When you are no longer our customer, we continue to share your information as described in this notice.</p> |
| <b>HOW?</b>  | 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.   |

| <b>REASONS WE CAN SHARE YOUR PERSONAL INFORMATION</b>   | <b>Does Waverly Advisors, LLC share?</b> | <b>Can you limit this sharing?</b> |
|---|--|------------------------------------|
| 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 a proposed or actual transaction involving our firm or any of our affiliates, including a merger, acquisition, reorganization, capitalization, or sale of assets. In such cases, we limit the information shared to what is reasonably necessary to evaluate or complete the transaction and require the parties to agree to maintain the information confidential. | Yes                                      | No                                 |
| 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                     |

**QUESTIONS?** Call (205) 871-3334, go to <https://waverly-advisors.com/> or email [info@waverly-advisors.com](mailto:info@waverly-advisors.com) or contact Waverly's Chief Compliance Officer, via email at [cco@waverly-advisors.com](mailto:cco@waverly-advisors.com).



WHO WE ARE

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|--------------------------------------|-----------------------|
| <b>Who is providing this notice?</b> | Waverly Advisors, LLC |
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WHAT WE DO

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| <b>How does Waverly Advisors, LLC protect my personal information?</b> | 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.  |
| <b>How does Waverly Advisors, LLC collect my personal information?</b> | <p>We collect your personal information, for example when you</p> <ul style="list-style-type: none"> <li>• Open an account or deposit money</li> <li>• Other sources of information include: <ul style="list-style-type: none"> <li>○ from clients on applications or other forms;</li> <li>○ from paper statements or via electronic download directly from clients' custodian;</li> <li>○ from third parties in connection with services we provide, such as planning, trading and portfolio analysis software, platforms and tools; and</li> <li>○ from activity on our website, such as data in contact forms, information request forms, website navigation; from "cookies" or similar files or scripts.</li> </ul> </li> </ul> <p>We also collect your personal information from others, such as affiliates or other companies in which clients make investments.</p>  |
| <b>Why can't I limit all sharing?</b>                                  | You do not have the right to opt out of information sharing that is necessary to effect, administer, or enforce transactions or that is otherwise permitted under applicable law. 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 <a href="mailto:info@waverly-advisors.com">info@waverly-advisors.com</a> or contact Markus Sleuwen, Chief Compliance Officer via phone at (205) 871-3334. |

DEFINITIONS

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| <b>Affiliates</b>      | Companies related by common ownership or control. They can be financial and non-financial companies.                     |
| <b>Non-Affiliates</b>  | Companies not related by common ownership or control. They can be financial and non-financial companies.                 |
| <b>Joint Marketing</b> | A formal agreement between nonaffiliated financial companies that together market financial products or services to you. |

OTHER IMPORTANT INFORMATION

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