



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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What Does Waverly Advisors, LLC (“Waverly” or “we”) Do With Your Personal Information?

Investment advisers are required by law to adopt appropriate policies and procedures that address safeguards to protect client nonpublic personal information and records. Waverly takes great measures to protect the information it gathers relating to its clients. Federal law gives clients the right to limit some but not all sharing of nonpublic personal information, and requires Waverly to tell clients how it collects, shares, and protects such information.

TYPES OF NONPUBLIC PERSONAL INFORMATION (“NPI”) WAVERLY COLLECTS

Waverly collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular client or device (“personal information”). In particular, we have collected the following categories of personal information from clients within the last twelve (12) months:

Category	Example
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers
Personal Information categories	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
Protected Classification Characteristics	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
Internet or other similar network activity	Browsing history, search history, information on a client’s interaction with a website, application, or advertisement
Professional or Employment related information	Current or past job history or performance evaluations

Waverly will not collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes without providing you notice.

Waverly collects nonpublic personal information about you from the following sources:

Sources
Information we receive from you on applications or other forms, such as your name, address, phone number, social security number, date of birth, account numbers, tax documents, income, employment and residential information, account balances, cash balances, security balances, other investments, net worth, investment objectives, goals, risk tolerance, and investment experience.
Information about your transactions with Waverly or with your custodian(s), such as buys, sells, gains, losses, fees, and/or holdings. Such information may be obtained from paper statements or via electronic download directly from your custodian.
Information from third parties that interact with Waverly in connection with the services we provide.

Information collected directly and indirectly from activity on our website.
Waverly's web servers collect domain names and/ or IP addresses of users to measure what pages and features are accessed by our visitors. This information helps Waverly administer the site, improve content, and gather broad demographic information for aggregate use.
Waverly also uses "cookies" or similar files or scripts throughout its website to enhance your convenience in using our websites, to improve search functionality, or to hold information that you would otherwise need to re-key. "Cookies" are text files collected by a user's web browser. If you do not wish to accept "cookies" from our website, you may configure your web browser so that it does not accept "cookies;" however, you may lose certain functions available on our website.

PARTIES TO WHOM WAVERLY DISCLOSES INFORMATION

Investment advisers may need to share the nonpublic personal information of their clients, internally, with their employees, with their Affiliates and with the employees of their Affiliates, and, externally, with their independent contractor service providers, including but not limited to insurance companies, custodians and certain third-party vendors, in order to run their everyday business.

The table below lists the reasons that Waverly may share your nonpublic personal information, and whether you can limit this sharing.

Reasons Waverly is permitted to share your nonpublic personal information.	Does Waverly share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, open or maintain your accounts, respond to court orders and investigations by governmental bodies or self-regulatory organizations, or report to credit bureaus.	Yes (for example, with our custodians, as applicable)	No
For our marketing purposes – to offer our products and services to you.	No	N/A – we don't share
For Joint Marketing with other financial companies.	No	N/A – we don't share
For our Affiliates' everyday business purposes – information about your transactions and experiences.	Yes	No
For our Affiliates' everyday business purposes – information about your credit worthiness.	No	N/A – we don't share
For our Affiliates or Non-Affiliates to market to you.	No	N/A – we don't share

Waverly's undertaking not to share, as indicated in the table above, applies in all events, except:

- as permitted or directed by any client according to a written instruction or authorization (including in the investment advisory agreement between Waverly and the applicable client),
- to facilitate the investment advisory services provided by Waverly and those Non-Affiliates that participate, directly and indirectly, in the provision of Waverly's investment advisory services, or
- as required or permitted by any applicable agreement, rule, regulation or law (Waverly may disclose or report personal information in limited circumstances where Waverly believes, in good faith, that disclosure is required or permitted under law, for example, to cooperate with regulators or law enforcement authorities).

Sharing Practices:

How does Waverly protect my nonpublic personal information?

To protect your nonpublic personal information from unauthorized access and use, Waverly maintains physical, electronic, and procedural safeguards that comply with federal standards. These measures include access restrictions, computer safeguards and physical office security procedures.

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How does Waverly collect my nonpublic personal information?

Waverly collects certain nonpublic personal information from you, for example, when you open an account.

Why can't I limit all sharing?

Federal law gives you the right to limit sharing only for:

- Affiliates' everyday business purposes – information about your creditworthiness;
- Affiliates or Non-Affiliates from using your information to market to you.

Some states have passed their own laws regarding data privacy, which have certain rights around Waverly's collection, use, and sharing of their 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 at 630.331.1600.

What happens when I limit sharing for an account I hold jointly with someone else?

Your choices will apply to everyone on your account.

Emergency Contact

From time to time, due to unforeseen circumstances relating to your physical or mental health, your best financial interests may be served if Waverly is able to communicate regarding you with another individual. If you have provided Waverly with a properly executed copy of your power of attorney, Waverly may contact your attorney-in-fact, if Waverly reasonably believes doing so is in your best interest. If you have designated a Trusted Contact or Client Advocate, Waverly may communicate with your Trusted Contact or Client Advocate. If your attorney-in-fact, Trusted Contact or Client Advocate is unavailable (or you do not have one or more of them), Waverly may communicate with a responsible family member that Waverly reasonably believes is an appropriate person with whom to communicate under the circumstances.

How Does Waverly Treat My Personal Information Once I Am No Longer A Client?

Waverly will provide nonpublic personal information about former clients only if required to do so by law or regulation, or in connection with continuing obligations of the former clients or the enforcement thereof (including the obligation of the former clients to pay Waverly or any of its Affiliates for any outstanding fees, charges or costs), or to those parties who need such information in order for Waverly (directly or indirectly) to carry out any continued obligation with respect to the services covered by the former relationship among Waverly and the former client.

Definitions:

"Affiliates" means companies related by common ownership or control. They can be financial and non-financial companies.

"Non-Affiliates" means companies not related by common ownership or control. They can be financial or non-financial companies. Waverly does not share with Non-Affiliates so they can market to you.

"Joint Marketing" means a formal agreement between Non-Affiliates that together market financial products or services to you. Waverly does not engage in Joint Marketing.

"Privacy Policy" means the policies set forth in this privacy policy, as amended from time to time. Waverly's use of your nonpublic personal information is subject to this Privacy Policy, as the same is in effect at the time of use. The provisions of this Privacy Policy supersede all previous notices or statements regarding Waverly's privacy policy.

Changes: Waverly reserves the right to change its Privacy Policy at any time without prior notice. Please access the disclosures page of our website (please click on this link [Waverly Advisors, LLC Privacy Policy \(waverly-advisors.com\)](https://www.waverly-advisors.com/privacy-policy) for the latest effective version of Waverly's Privacy Policy. In the event that Waverly changes its Privacy Policy to allow it to disclose nonpublic personal information that applicable law permits to be limited from sharing by customers, Waverly clients may opt out of such disclosure by means of a request via email to info@waverly-advisors.com or by contacting

Markus Sleuwen, Chief Compliance Officer, at 630.331.1600. If, at any time, Waverly adopts material changes to its Privacy Policy, Waverly will provide its clients notice of such material changes or notice of the existence of a revised Privacy Policy (including a copy of the same, a link to the same or instructions for accessing the same).

Scams: Waverly does not send emails to clients, and does not have websites, that request billing, login or password information of clients. If you receive an email purporting to be from Waverly, or access a website purporting to be from Waverly, that asks you to provide any of your personal nonpublic information, including any account-related or any login or password information, do not provide such information unless you have first verified the legitimacy of such email from or website of Waverly. Such email or website may be fraudulent and used in connection with scams, including phishing. Please immediately report to Waverly any suspicious email that you receive or website that you access.

Disposal of Information: Waverly has taken steps to reasonably ensure that the privacy of your nonpublic personal information is maintained at all times, including in connection with the disposal of information that is no longer required to be maintained. Such steps shall include whenever possible, shredding paper documents and records prior to disposal, requiring off-site storage vendors to shred documents maintained in such locations prior to disposal, and erasing and/or obliterating any data contained on electronic media in such a manner that the information can no longer be read or reconstructed.

Contact and Modifying Personal Information: If you should ever decide to close your account(s) or become an inactive client, we will continue to adhere to the privacy policies and practices as described in this notice. Should you have any questions about the privacy and protection of your records, please contact Waverly. You may request copies of, or have Waverly make changes or corrections to, nonpublic personal information in Waverly's possession, or opt out of receiving further communications from Waverly, by requesting the same via email to info@waverly-advisors.com or by contacting Markus Sleuwen, Chief Compliance Officer, at 630.331.1600.

Governing Law and Jurisdiction: 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. Any disputes arising out of this Policy shall be adjudicated in a court of competent jurisdiction in the County of Jefferson, State of Alabama.

Questions? Please direct your request for a copy of this Privacy Policy to Waverly via email at info@waverly-advisors.com or, should you have any questions regarding the above, please contact Markus Sleuwen, Chief Compliance Officer, at 630.331.1600. Your privacy, our professional ethics, and the ability to provide you with quality investment advisory services are very important to Waverly.