

As a client of IWM, you share both public and private information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information. Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives the customer the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information. In that regard, we are providing an annual Privacy Notice.

We collect personal financial information about our clients from the following sources:

- Information our clients provide us in the investment advisory agreement, the account applications and other documents clients complete in connection with the maintenance of their accounts;
- Information clients provide through oral and electronic communications;
- Information we receive from third parties, such as brokerage firms, about your transactions and accounts;
- Non-public information that is collected such as social security numbers, income, account balances, securities and personal holdings, driver's license numbers, passport numbers, etc.

Purpose for collecting information:

- We collect and use clients' personal information only as necessary to provide investment advisory services, service and administer accounts, comply with applicable legal and regulatory requirements, safeguard client information, and support our legitimate business operations.

We do not disclose any nonpublic information about you to anyone, except in the following circumstances:

- When required to execute transactions for your account or otherwise to provide services you have requested with your designated custodial agent; or
- When you have specifically authorized us to do so in writing; or
- When permitted by law; or
- When information is required for disciplinary purposes through professional designations such as the CFP Board or other professional organizations where complaints may be filed.

Within our firm:

- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf or so that our firm can discuss your financial situation with your accountant or lawyer.)
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. It will include information about your personal finances, information about your health to the extent that it is needed for the planning process, information about transactions between you and third parties, and information from consumer reporting agencies.

For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require

- Strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.
- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.
- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws, and consistent with the CFP Board Code of Ethics and Professional Responsibility. After this required period of record retention, all such information will be destroyed.
- No mobile opt-in or text message consent will be shared with third parties or affiliates.

Federal law gives you the right to limit sharing - opting out.

- Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: sharing for affiliates’ everyday business purposes – information about your creditworthiness; or sharing with affiliates or non-affiliates who use your information to market to you.
- State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.

If you have any questions about our privacy policy, please call us at (513) 289-2625.