

# Privacy Policy

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Effective Date: December 14, 2025

## OUR COMMITMENT TO YOUR PRIVACY

CleverAlpha Asset Management, LLC ("CleverAlpha," the "Firm," "we," or "us") is committed to safeguarding the confidential information of our clients. We hold all personal information provided to our Firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by CleverAlpha.

This Privacy Policy explains how we collect, use, share, and protect your personal information in compliance with **Regulation S-P**, the **Gramm-Leach-Bliley Act (GLBA)**, and applicable state laws (including the **California Privacy Rights Act**).

By using the CleverAlpha website ([www.cleveralpha.com](http://www.cleveralpha.com)) or our advisory services, you consent to the data practices described in this statement.

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## 1. INFORMATION WE COLLECT

To provide you with accurate investment advice and efficient service, we collect nonpublic personal information ("NPI") about you from the following sources:

- **Information You Provide:** When you open an account, seek advice, or fund your account, we collect data such as:
  - Name, address, email, and phone number.
  - Social Security Number (SSN) or Tax ID.
  - Date of birth, age, and gender.
  - Assets, income, investment experience, and risk tolerance.
  - Banking information (routing/account numbers) for funding.
- **Transactional Information:** Information about your transactions with us, our affiliates, or others, including:
  - Account balances, positions, and transaction history.
  - Deposit and withdrawal history.
  - **Digital Assets:** Wallet addresses or cryptocurrency holdings if connected to our platform.
- **Digital & Device Information:** When you interact with our website, we may automatically collect:
  - IP address, browser type, device identifiers, and domain names.

- Site usage data (pages visited, time spent) to improve our user experience.

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## 2. HOW WE USE YOUR INFORMATION

We use the information we collect primarily to:

- Provide investment advisory services and manage your accounts.
- Process your requests for transactions (e.g., deposits to custodians like Charles Schwab or payments via Dwolla and MX Financial).
- Verify your identity in compliance with **Anti-Money Laundering (AML)** regulations.
- Communicate with you regarding your account, market alerts, or security notifications.
- Detect and prevent fraud or unauthorized access.

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## 3. INFORMATION SHARING AND DISCLOSURE

**We do not sell, rent, or lease your personal information to anyone.**

However, ensuring efficient service requires us to share your information with trusted third parties in limited circumstances:

- **Service Providers & Custodians:** We share information with non-affiliated third parties solely to process transactions and service your account. This includes:
  - **Qualified Custodians:** (e.g., Charles Schwab) to hold your assets.
  - **Payment Processors:** (e.g., Dwolla and MX Financial) to facilitate funds transfers.
  - **Technology Vendors:** CRM systems, portfolio management software, and cloud storage providers (e.g., Google Drive and Vault for backups, AWS for code hosting and Bedrock for LLM).
- **Legal & Regulatory Requirements:** We may disclose information if required by law, such as to comply with a subpoena, regulatory examination (SEC), or to cooperate with law enforcement.
- **Your Consent:** We may share information with other parties if you specifically authorize us to do so.

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## 4. SECURITY OF YOUR INFORMATION

We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

- **Encryption:** We use industry-standard encryption (TLS/SSL) for data in transit and at rest.
- **Access Controls:** Access to your information is restricted to employees and service providers who need to know that information to provide products or services to you.
- **Incident Response:** In the event of a security breach that compromises your sensitive customer

information, CleverAlpha will notify affected individuals in accordance with strict timelines under Regulation S-P and applicable state laws.

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## 5. COOKIES AND TRACKING

Our website uses "cookies" and similar tracking technologies to personalize your experience and analyze site traffic.

- **Functionality:** Cookies help us recall your specific information (like your dashboard settings) on subsequent visits.
  - **Control:** Most browsers accept cookies automatically, but you can modify your settings to decline them. Note that declining cookies may limit your ability to use certain interactive features of our platform.
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## 6. YOUR PRIVACY RIGHTS (State-Specific)

### For California Residents (CCPA/CPRA)

If you are a resident of California, you have specific rights regarding your personal information:

- **Right to Know:** You may request details about the categories of personal information we have collected and shared.
- **Right to Delete:** You may request that we delete your personal information, subject to certain legal exceptions (e.g., recordkeeping requirements under the Advisers Act).
- **Non-Discrimination:** We will not discriminate against you for exercising your privacy rights.
- **Limit Sharing:** Under California law, we automatically limit sharing with non-affiliates for marketing purposes.

### For Vermont & Nevada Residents

- **Vermont:** We automatically treat accounts with Vermont mailing addresses as if you have opted out of sharing with non-affiliated third parties, except as permitted by law.
  - **Nevada:** You have the right to request explicitly to be placed on our internal "Do Not Call" list.
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## 7. FORMER CLIENTS

If you close your account or become an inactive client, we will adhere to the privacy policies and practices as described in this notice. We retain client records for at least five years in accordance with SEC Rule 204-229.

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## 8. CHANGES TO THIS POLICY

CleverAlpha reserves the right to modify this Privacy Policy at any time. If we make material changes, we will notify you by email or by posting a prominent notice on our website<sup>30</sup>. Continued use of our services constitutes your agreement to the modified policy.

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## CONTACT INFORMATION

CleverAlpha welcomes your questions or comments regarding this Statement of Privacy.

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