

## **LWS Financial Privacy Policy**

### **Latest Update [02/10/2026]**

**Our Commitment to Privacy:** LWS Financial has a standing policy of protecting the confidentiality and security of information we collect about our clients. We will not share non-public information about our clients ("Information," as further described below) with third parties, except for the specific purposes described below. This notice describes the Information we may gather and the circumstances under which we may share it.

**Why We Collect & How We Use Information:** We collect and use Information from our clients and from third party sources in order to (1) deliver service in the course of our client engagements and (2) to satisfy our obligations as an Investment Advisor regulated by the U.S. Securities Exchange Commission (SEC) and other state and federal regulatory agencies.

**How We Gather Information:** We get Information directly from our clients in the course of our engagements and through third party sources, including reporting agencies, databases and other sources. This Information may relate to the finances, employees, customers, or other information, as well as transactions and interactions with, LWS Financial or others.

**How We Protect Information:** Our employees are required to protect the confidentiality of Information and to comply with our established policies. They may access Information only when there is an appropriate reason to do so, such as the execution of transactions on behalf of our clients. We also maintain physical, electronic and procedural safeguards to protect Information, which comply with Federal standards. Employees who violate our Privacy Policy are subject to internal disciplinary actions and, as appropriate, legal sanctions. Disposal of any paper document with confidential client Information is shredded.

**Disclosure of Information:** We may disclose Information (as described above) as directed by our clients as necessary for the execution of our engagements to counterparties under non-disclosure agreements acceptable to our clients, or where the law requires disclosure. It is LWS Financial's policy to require all third parties who receive any Information to sign strict confidentiality and non-disclosure agreements.

**To Whom This Policy Applies:** This Privacy Policy applies to clients of LWS Financial (and its third-party service providers). Even if you are no longer a client of LWS Financial for which we no longer provide services, our Privacy Policy will continue to apply to you.

**Access to and Correction of Information:** If our clients desire to review any file we may maintain, please contact us. If our clients notify us that any Information is incorrect, we will review it and make revisions as appropriate. Information collected in connection with, or in anticipation of, any claim or legal proceeding may not be made available.

**Online Privacy Notice:** LWS Financial takes its responsibility to maintain the confidentiality of information that it receives from its clients and prospective clients very seriously. Accordingly, parties should know that when visiting the LWS Financial website, one is not required to provide any personal information.

**Further Information:** We reserve the right to change this Privacy Policy. The examples contained within this Privacy Policy are illustrations and they are not intended to be exclusive. This notice complies with Federal law and SEC regulations regarding privacy. You may have additional rights under other foreign or domestic laws that may apply to you.

Customer complaints may be directed to LWS Financial, 90 Park Avenue, 17<sup>th</sup> Floor, New York, NY 10016 or by phone: 212-536-6000 Questions concerning this privacy policy may be directed to us by calling: 646-201-9055 or via email: [info@lwsfinancial.com](mailto:info@lwsfinancial.com).