

WELA STRATEGIES, INC

PRIVACY NOTICE

At Wela Strategies, Inc, protecting your privacy is very important to us. As a financial services firm, we collect and use nonpublic personal information in order to provide our clients (prospective, current, or former) with a broad range of financial services as effectively and conveniently as possible.

Nonpublic personal information (“NPI”) is confidential personal information about you that we obtain in connection with providing financial services or products to you. We are providing this notification to inform you of the types of NPI we collect, our privacy safeguards, and sharing practices. We treat NPI in accordance with our privacy policy.

What Information Do We Collect?

We need certain information to analyze the financial situation of prospective clients and to provide investment advisory and management services to clients. Generally, this includes your name, address, social security number, date of birth, account numbers and personal financial information (e.g., net worth, income, financial assets). We may also have access to other sensitive information, such as credit scores, income tax information, insurance and medical information, and so forth.

Where Do We Get This Information?

We may collect nonpublic personal information about you from a variety of sources, such as:

- Information we receive from you on applications or other forms;
- Information we receive from you during in-person meetings, phone calls and from written communications;
- Information about your transactions with us, our affiliates or others, such as the custodian(s) of your account(s); and
- Information we receive from non-affiliated third parties, including consumer reporting agencies.

To Whom Do We Disclose NPI?

We do not disclose the NPI we collect about our clients to anyone except: (1) in furtherance of our business relationship with clients, and then only to those persons necessary to effect the transactions and provide the services that clients authorize (such as broker-dealers, custodians, independent managers, proxy voting firms, etc.); (2) to persons assessing our compliance with industry standards; (3) our attorneys, accountants, and auditors; or (4) as otherwise provided by law. This applies to current as well as former clients. We restrict access to your nonpublic personal information to those who need to know that information to provide our business-related services.

For marketing and communication purposes, we share information (e.g., client name & email address) to third party service providers who assist us in processing communications.

Our “affiliates” are companies with which we share common ownership or control. We will share your contact information (name, address, phone number, email address) with our affiliates if you express an interest in or engage them for their services. Any other sharing must be authorized in writing by you. Our affiliated companies are Capital Investment Advisors, LLC; Capital Accounting & Tax, LLC; Barnes, Merritt & Barnes, CPA; and Capital Administration, LLC.

Our Security Procedures

We restrict access to your NPI to those who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your NPI. This includes measures to protect your information in the course of its disposal.

European Economic Area Residents

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws. If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority.

California Residents

If we have your information as a result of your visit to our website, a third party providing your information to us or your meeting with us, you have the following rights (1) to request a description of the categories information we have collected about you in the last 12 months, (2) to request the specific pieces of personal information we have about you, and (3) to request a copy of the information we have about you twice in a 12-month period. We will provide that information to you within 45 days of such a request. Before we send you such information, however, we will use reasonable efforts to verify that the request is from you depending on the request. You also have the right to request that we delete your personal information from our records, except to the extent we are required by law to retain any record. We will request you to verify such a request to delete your data in the same manner.

Use of our website.

Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behavior information. We use your information collected from the website to personalize your repeat visits to the site. Additionally, we use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information visit <http://www.allaboutcookies.org/>. You can set your browser not to accept cookies and the foregoing website tells you how to remove cookies from your browser. However, in a few cases some of our website features do not function as a result.

Our website contains links to other websites. Our privacy policy only applies to our website. Therefore, when you link to other websites you should read their privacy policies and our privacy policy does not extend to any other vendor, company, or third party linked to from our website.

Future Policy Revisions

We may update our privacy policy from time to time. If we make material changes to the privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification.

Contact Information

Email: aura@getwela.com

Phone: 678-608-0420

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