

PRIVACY POLICY

A Smarter Way To Invest, Inc. considers the protection of personal information to be a foundation of customer trust and a sound business practice. We employ physical, electronic and procedural controls in order to protect client confidentiality. We may use personal information about you to assist us performing investment management services, completing transactions or account changes, and to maintain or provide ongoing service to your account. We only share information about our clients within the A Smarter Way To Invest, Inc. firm and with certain third-party service providers that assist us in servicing your account. All third-party service providers are required to protect the privacy of your personal information. At A Smarter Way to Invest, Inc. we will always restrict access to personal information to those who require it to provide products or services to you. The only time we will provide any information about you, or your financial information is with your express, written consent as required by law.

If you do not want us to share information, other than required by law, with third parties, please clearly indicate your request in writing, and provide directly to ASWTI or via your Registered Investment Advisor (RIA) and/or its Investment Advisor Representatives (IARs). If you wish confirmation of receipt of your request, then enclose a self-addressed stamped envelope. If you have any questions concerning this or other A Smarter Way to Invest, Inc. policies, please contact your investment advisor representative or our Corporate Office at (810) 588-6178. Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this policy.

Why you need to know?

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you, if applicable?

Driver’s license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address, and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources, if applicable?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account



How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural, and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect the Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our RIAs and their Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you , consistent with applicable law, including but not limited to: processing transactions; custodial requirements, general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes The Firm does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where The Firm or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients The Firm does not disclose and does not intend to disclose, non- public personal information to non-affiliated third parties with respect to persons who are no longer our Clients or receiving our services.	No	Not Shared

Changes to our Privacy Policy

We provide a copy of this Policy annually to the RIAs that engage our services for their Clients and will provide a copy to the RIAs individual clients upon request.

Periodically we may revise this Policy and will provide the RIAs with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify the RIA and provide them and their Clients the opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us by email to support@asmarterwaytoinvest.com or calling the Firm at (810) 588-6178 and ask to speak with the Compliance department.

