

Privacy Notice

FACTS

What does ICW Investment Advisors LLC, doing business as Intelligent Capitalworks (“ICW”), do with your personal information?

Why?

Financial companies choose how they will share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depends on the service we provide for you. This information can include:

- Non-Public Personally Identifying information, such as Social Security Numbers, dates of birth, and driver’s license numbers
- Non-Public Financial Institution information, such as account numbers, balances and transactional information
- Non-Public Personal Financial information, such as income, employment and other information acquired from applications or other forms, in-person interviews with you, authorized software, and information we receive from your trusted advisors (accountants, attorneys and other advisors)
- Information used in the ordinary course of business, such as email addresses, phone numbers and other operational information

When you are *no longer* our client, we may continue to share your information as described in this notice.

How?

All financial companies need to share clients’ personal information to run their everyday business. In the section below, we list the reasons financial companies may share their clients’ personal information; whether ICW chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information:	Does ICW share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or provide services that you request and authorize	Yes – as required or permitted by law	No
For our marketing purposes – to offer our services to you	No	Not Applicable
For joint marketing with other financial companies	No	Not Applicable
For our affiliates’ everyday business purposes – information about your transactions and experiences	We don’t share	Not Applicable
For our affiliates’ everyday business purposes – information about your creditworthiness	We don’t share	Not Applicable
For nonaffiliates to market to you*	No	Not Applicable

* Nonaffiliated entities may collect information directly from you when you use their software or visit their website. ICW has no control over what data they collect and how it is used. These entities are required to furnish you with their own Privacy Policy to disclose this information.

Questions?

Call (480) 951-2900 or email compliance@icwia.com.

What we do	
How does ICW protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with Federal law. These measures include computer safeguards and secured files and buildings.
How does ICW collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> • Enter into a Professional Services Agreement with us • Seek financial, investment, tax or estate planning advice • Open an account • Make deposits or withdrawals from your account(s) at your request • Direct us to buy or sell securities <p>We may also collect your personal information from your Custodian(s), authorized third-party software and your trusted advisors, such as your accountant, attorney, or other advisor(s).</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes – information about your creditworthiness • Affiliates from using your information to market to you • Sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • ICW has no affiliates
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • ICW does not share with nonaffiliates so they can market to you.
Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • ICW does not jointly market products or services to you.

Requests for Information
<p>For a copy of our Privacy Policy please contact the Chief Compliance Officer either in writing at 16427 North Scottsdale Road, Suite 350 Scottsdale, AZ 85254 or by phone at (480) 951-2900.</p>

Other Important Information
<p>If you would like ICW Investment Advisors LLC to provide information to otherwise unauthorized parties, you must first provide written authorization for us to release information.</p> <p>Please contact us at (480) 951-2900 to request an authorization form.</p>