Privacy Policy 2026

Introduction
KWM Financial LLC ("KWM" or the "Firm") takes measures to ensure that the use and disclosure of your private personal information is consistent with applicable law.

Our Consumer Information Privacy Policy ("Privacy Policy") explains what nonpublic personal information we collect, why the Firm collects it, how the Firm protects your nonpublic personal information, and how and why, in certain cases, the Firm shares such information amongst KWM or with other parties. Our Privacy Policy may be amended from time to time. Our Privacy Policy applies to nonpublic personal information collected or used when the Firm offers investment products or services to individuals for personal, family, or household purposes. This disclosure is made on behalf of the Firm listed in the "Application of Privacy Policy for KWM Financial LLC" section below.

Our Privacy Policy applies only to individual Firm investors (both current and former investors) who have a direct relationship with KWM. If you own KWM investment products or receive KWM services in the name of a third-party broker dealer, investment adviser, or other financial service provider, that third party's privacy policies may apply to you.

Information That We Collect and May Disclose

KWM collects information from and about you in order to provide the superior level of service that you expect. Nonpublic personal information about you may include: your name, mailing address, e-mail address, tax identification number, age, account information, investment amounts in our companies, marital status, number of dependents, assets, debts, income, net worth, employment history, financial statements, beneficiary information, personal bank account information, credit history information, broker dealer, financial advisor, IRA custodian, account joint owners and other similar parties, the Firm's investment products and services you purchase, your account balance or transactional history with the Firm, the fact that you are or have been an investor in a Firm sponsored investment and particulars related to any such investment.
Specific examples of personal information that the Firm may collect and may disclose to affiliates and certain third parties include:

- Information the Firm receives from you on applications, subscription agreements, or other forms. Examples include your name, mailing address, and e-mail address.
- Information about your transactions with the Firm, its affiliates, and others such as account balances, payment history, account activity and financial statements.
- If you visit the Firm's Internet website: www.gotokwm.com.
- If you create a login and password on one of the websites to access your account with the Firm, KWM will collect and use the login and password to verify your identity and for the Firm's internal use in maintaining your website account.
- Information obtained from others, such as credit reports from consumer credit reporting agencies.

How We Use and Disclose Information

KWM and third-party service providers work together to provide a variety of investment products and services, and they may need to share some or all nonpublic personal information collected on you to maintain an efficient and effective network of products and services. KWM believes that by sharing information about you and your accounts among our companies and partners, the Firm is better able to serve your investment needs and to suggest services or educational materials that may be of interest to you. The responsible use and disclosure of the nonpublic personal information the Firm collects is crucial to our ability to provide our clients with the type of goods and services they expect, and may occur under a variety of different circumstances. For example, the Firm may:

- Use your personally identifiable information internally for the purposes of furthering our business, which may include analyzing your information, matching your information with the information of others, processing services, maintaining accounts, resolving disputes, preventing fraud and verifying your identity.
- Disclose your personally identifiable information when required by law, such as requests for personal information in connection with a judicial, administrative or investigative matter.

- Use and disclose your personally identifiable information on an aggregate basis. This means that the Firm combines parts of your information with parts of the information from our other users without including your name, complete telephone number, complete e-mail address or your street address, in the combination. Examples of how the Firm uses aggregate information include determining the most common zip code among the users of the websites and disclosing that zip code to other parties, or determining and disclosing demographic information such as the average income of investors in our funds.

Sharing Amongst KWM Affiliates and Nonaffiliated Service Providers
KWM may share your personally identifiable information among Firm affiliates engaged in investment or other related financial service activities. Examples might include customer-initiated service requests, establishing and managing your investor accounts, completing your investor transactions, and sharing information with parties acting at your request and on your behalf, such as your broker-dealer, financial advisor, joint owners and IRA custodian.

Sharing With Non Affiliated Service Providers
KWM may disclose your personal information to nonaffiliated service providers who perform business functions on our behalf, which may include marketing of our own investment products and services, check printing, and data processing. Nonaffiliated third party service providers often aid us in the efficient and effective delivery of services and there may be circumstances where it is necessary to disclose nonpublic personal information the Firm collects to such parties. However, before the Firm discloses nonpublic personal information to a nonaffiliated party, we require them to agree to keep our investor information confidential and secure and to use it only as authorized by us. Also, KWM will only share your nonpublic information with nonaffiliated third parties under circumstances not covered by state or federal law "opt-out" notice exceptions, such as servicing a financial product or service authorized by the customer, resolving consumer disputes, and protecting against potential fraud or unauthorized transactions. Should this policy ever change in the future, you will be given adequate notice and the option to "opt-out" of such disclosure.
KWM may also disclose the following information to companies that perform marketing services on our behalf or to other financial institutions with which the Firm has joint marketing agreements:

- Information the Firm receives from you on applications or other forms, such as your name, address, social security number, assets and income.

- Information about your transactions with us, our affiliates, or others, such as your payment history, and parties to the transactions.

- Information the Firm receives from a consumer reporting agency, such as your creditworthiness and credit history.

KWM requires all joint marketers to have written contracts with us that specify appropriate use of your personal information, require them to take steps to safeguard your personal information, and prohibit them from making unauthorized or unlawful use of your personal information. KWM does *not* share, sell, or rent your personal private information with outside marketers who may want to offer their own products and services to you.

How the Firm Protects Your Information
KWM maintains a comprehensive information security program designed to ensure the security and confidentiality of customer information, protects against threats or hazards to the security of such information, and prevents unauthorized access. This program includes:

- Procedures and specifications for administrative, technical and physical safeguards.

- Security procedures related to the processing, storage, retention and disposal of confidential information.

- Programs to detect, prevent and when necessary respond to attacks, intrusions or unauthorized access to confidential information.

- Restricting access to customer information to employees who need to know that information to provide products and services to you, and appointing specific employees to oversee our information security program.

Availability of Our Privacy Policy
KWM will provide notice of our Privacy Policy annually, as long as you maintain an ongoing relationship with us. The most up-to-date Privacy Policy is posted on our websites.

Notification of Changes to Our Privacy Policy
If KWM decides to change our Privacy Policy, the Firm will post those changes on the website so our users and investors are always aware of what information the Firm collects, uses and discloses. If at any point we decide to use

or disclose your personally identifiable information in a manner different from that stated at the time it was collected, KWM will notify you in writing. The Firm will otherwise use and disclose a user's or an investor's personally identifiable information in accordance with the Privacy Policy that was in effect when such information was collected.

Change in Control
If KWM experiences a "change in control" (defined below), then the Firm may amend our information practices as described in this Privacy Policy. The Firm will disclose your personally identifiable information to the company or other legal entity that succeeds the company subject to the change in control or the operation of the website. The privacy policy of the succeeding legal entity will then govern the personally identifiable information that the applicable firm had collected from you under this Privacy Policy. However, if applicable law prohibits the succeeding legal entity's privacy policy from governing your personally identifiable information, then this Privacy Policy shall continue to govern. "Change in control" means any of the following events:

- A reorganization, merger, consolidation, acquisition or other restructuring involving all or substantially all of KWM's voting securities and/or assets, by operation of law or otherwise.
- Insolvency.
- A general assignment for the benefit of creditors.
- The appointment of a receiver.
- The filing of a bankruptcy or insolvency proceeding.
- The liquidation of assets.

Questions about Our Privacy Policy
If you have any questions about our Privacy Policy and/or the personal information practices of our Website, please contact us at: admin@gotokwm.com.

Application of Privacy Policy for KWM Financial LLC
This Privacy Policy applies to KWM Financial LLC and its respective subsidiaries and all other funds or entities created in the future that offer investment products or services to individuals for personal, family, or household purposes.