

PRIVACY POLICY

Our Commitment to You

Wells Financial Advisors, Inc. d/b/a TSW Wealth Management (“TSW”) is committed to safeguarding the use of your personal information that we have as your Investment Advisor. TSW (referred to as “we”, “our” and “us” throughout this notice) maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients’ nonpublic personal information. Through this policy and its underlying procedures, TSW attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. TSW does not, and shall not, disclose or share information with any affiliated or nonaffiliated persons, entities or service providers for marketing or any other purposes or reasons not referenced in this privacy policy. Nor does TSW provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification	• Investment activity
• Employment information	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others.

DEFINITIONS: Affiliates – companies related by common ownership or control. They can be financial and nonfinancial companies; Non-affiliates – companies not related by common ownership or control. They can be financial and nonfinancial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you.

Information About You that TSW Shares

TSW works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. This includes Purshe Kaplan Sterling Investments (PKS), in its capacity as the broker-dealer with whom Terry Wells and Sarah Wells are registered representatives. Purshe Kaplan Sterling Investments is not affiliated with Wells Financial Advisors, Inc. d/b/a TSW Wealth Management. PKS is required under applicable rules and regulations to supervise certain activities of Terry Wells and Sarah Wells, including their activities as investment advisor representatives. This means that PKS will have access to records related to TSW, including some client information.

In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy TSW's regulatory obligations, and as otherwise required or permitted by law. TSW 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. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. These unaffiliated service providers and vendors are used in furtherance of establishing, maintaining, and reporting on the client's TSW relationship (i.e., broker-dealer, account custodian, record keeper, technology, performance reporting, customer relationship management software [CRM], proxy voting, insurance, independent managers, sub-advisers, etc.). We limit their use of your personal information to the performance of the specific service(s) we have requested.

ANY QUESTIONS OR CONCERNS: Should you have any questions regarding the above, please contact Terry Wells, Chief Compliance Officer.

DEFINITIONS: Affiliates – companies related by common ownership or control. They can be financial and nonfinancial companies; Non-affiliates – companies not related by common ownership or control. They can be financial and nonfinancial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you.