

# TSW Wealth Management 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) protects the security and confidentiality of the personal information we have and makes efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account(s). 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. 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.

## 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 Triad Advisors, LLC, in its capacity as the broker-dealer with whom Terry Wells and Sarah Wells are registered representatives. Triad Advisors, LLC, is not affiliated with Wells Financial Advisors, Inc. d/b/a TSW Wealth Management. Triad Advisors, LLC is required under applicable rules and regulations to supervise the activity of Terry Wells and Sarah Wells, including their activities as investment advisers. This means that Triad Advisors, LLC will have access to records related to TSW, including 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 is otherwise required or permitted by law. 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. We limit their use of your personal information to the performance of the specific service(s) we have requested.

**To repeat, we DO NOT and WILL NOT sell your non-public personal information to anyone.**

#### **Information About Former Clients**

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.

#### **Confidentiality and Security**

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

#### **We'll Keep You Informed**

Periodically we may revise our Privacy Policy, and will provide a copy to any client that has a current engagement with us. 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 you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current Privacy Policy by contacting us at (508) 655-9303.

#### **The Right to Limit Sharing Federal**

Federal law allows you the right to limit the sharing of your non-public personal information by "opting-out" of the following: (i) sharing for affiliates' everyday business purposes -- information about your creditworthiness; and (ii) sharing with affiliates who use your information to market to you. State laws (see below) and individual companies may give you additional rights to limit sharing. Please notify us immediately at our address or telephone number if you choose to opt out of these types of sharing.

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#### **The Right to Limit Sharing Massachusetts**

Massachusetts law gives its residents additional rights to limit sharing. Under Massachusetts law, we may not share non-public personal information with non-affiliates unless we first receive written permission as indicated below ("opting-in"). If we do not receive permission to share this non-public personal information, then we are prohibited from sharing this non-public personal information with "non-affiliates" as defined below.

**I give you permission to share my non-public personal information with non-affiliates as described herein.**

*Signature of Client(s):* \_\_\_\_\_

**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.