

Alaethes Wealth, LLC

PRIVACY NOTICE

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Alaethes Wealth, LLC ("Alaethes").

Information We Collect: In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us, our affiliates, or others;
- Information about your visit to our website. We store that information in web server logs, which are records of the activities on our sites. The servers automatically capture and save the information electronically. The information we collect in web server logs helps us administer the site, analyze its usage, protect the website and its content from inappropriate use and improve the user's experience.

Categories of Information We Disclose: We may only disclose information that we collect in accordance with this policy. Alaethes does not sell customer lists and will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account at Alaethes, except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company, other investment advisers;
- To comply with broker-dealer firms that have regulatory requirements to supervise certain representatives' activities;
- To third parties who perform services or marketing, client resource management or other parties to help manage your account on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

How We Use Information: Information may be used among companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts/non-public information** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you and/or Alaethes;
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;
- **To keep you informed** about financial services of interest to you.

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. Alaethes does not receive information regarding marketing eligibility from affiliates to make solicitations.

Our Security Policy: We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

Cyber Security: Internal policies and procedures are in place to address cyber security. A copy of this policy is available upon request.

Succession Planning: In the event that the owner(s) of Alaethes retire, become incapacitated or perish unexpectedly, your information would be disclosed to an unaffiliated third party for the purposes of facilitating a business succession plan. A change in control of ownership of Alaethes would require your consent, as dictated by your signed agreement with Alaethes, in order to continue providing services to you.

Policy: Non-public personal information ("NPI") is any personal information that cannot be found in public sources. Publicly available information would be details available from federal, state, or local government records; widely distributed media (such as telephone directories or newspapers); or information disclosed to the public as required by federal, state, or local law. NPI is usually obtained directly from the individual. It includes such details as the person's date of birth, social security number, financial account numbers and balances, sources and amounts of income, credit card numbers, information obtained about visitors to your Internet web site, and sometimes could include home addresses and telephone numbers. Under Gramm-Leach-Bliley Act, each investment adviser must give its customers either a full notice or simplified notice of the firm's privacy policies. Therefore, our firm would like you to know that Alaethes may disclose clients NPI to non-affiliated third parties. Our firm will cease disclosing client's information upon that client's termination from our firm.

Mark any you want to limit:

- ☐ Do not use my personal information to market to me.
- ☐ Do not use my personal information for marketing with other financial companies.
- ☐ Do not share information about my transactions and experiences with your affiliates.
- ☐ Do not use my information about my creditworthiness for affiliates everyday business purposes.
- ☐ Do not allow your affiliates to use my personal information to market to me.
- ☐ Do not share my personal information for non-affiliates to market to me.

The limitations **above do not** apply to disclosure of confidential information in the following circumstances:

- For resolving consumer or customer disputes or inquiries;
- To persons holding a legal or beneficial interest relating to the consumer or customer;
- To persons acting in a fiduciary or representative capacity on behalf of a consumer or customer;
- To provide information to agencies assessing your firm's compliance with industry standards, and to your attorneys, accountants, and auditors;
- In connection with a proposed or a actual sale or merger of your firm;
- To respond to a regulator's examination of your firm;
- To comply with a civil, criminal, or regulatory investigation by federal, state, or local authorities.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

Complaint Notification: Please direct complaints to: Candise Holmlund at Alaethes Wealth, LLC, P.O. Box 2108, Rancho Santa Fe, CA 92067 or 858-735-9685.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Alaethes Wealth, LLC, P.O. Box 2108, Rancho Santa Fe, CA 92067 or 858-735-9685.