Wealth Engagement

Privacy Policy

CLIENT PRIVACY NOTICE

Effective: September 4, 2026

Our Commitment to You

Wealth Engagement LLC (“WE LLC”) is committed to safeguarding the personal information we maintain as your investment adviser. WE LLC (referred to as “we,” “our,” and “us” throughout this notice) protects the security and confidentiality of personal information and seeks to ensure that it is used for proper business purposes in connection with managing or servicing your account. Our relationship with you is our most important asset. We understand that you have entrusted us with private information, and we work to maintain that trust.

We do not sell your non-public personal information. WE LLC provides such information to others only for proper business purposes connected with managing or servicing your account, as described below.

WE LLC provides this Privacy Policy to prospective clients before or when establishing an advisory relationship, to clients at onboarding and annually thereafter, and upon any material change.

The Information We Collect About You

You typically provide personal information when completing the paperwork required to become a client. This information may include:

- Name and address
- E-mail address
- Phone number
- Social Security or taxpayer identification number
- Assets and income
- Account balances and investment activity
- Accounts at other institutions

We may also collect non-public information from brokerage agreements, managed-account agreements, subscription and account-opening documents; applications, forms, and questionnaires used to establish the client relationship; and information concerning your transactions with us or others.

Information About You That WE LLC Shares

WE LLC may share non-public personal information with non-affiliated third parties, such as brokers and custodians, as necessary to provide agreed services and products and as permitted by law. We may also disclose information to you; persons we reasonably believe are your authorized agents or representatives; regulators; and companies engaged to help administer our business. Service providers may use the information only for authorized services and are expected to maintain its confidentiality. We limit use of personal information to the specific services requested.

To repeat, we do not sell your non-public personal information.

Information About Former Clients

WE LLC does not disclose, and does not intend to disclose, non-public personal information about former clients to non-affiliated third parties except as required or permitted by law.

Confidentiality and Security

WE LLC’s supervised persons, access persons, consultants, and authorized service providers are advised of the need to respect the confidentiality of customers’ non-public personal information. WE LLC maintains physical, procedural, and electronic safeguards designed to protect information from unauthorized access. A separate Information Technology and Cybersecurity Policy governs the Firm’s technical and administrative controls for protecting client data.

Service Provider Oversight

WE LLC exercises due diligence in selecting and monitoring service providers that access, maintain, process, or otherwise handle customer information. The Firm’s policies and procedures are reasonably designed to ensure that applicable service providers maintain appropriate safeguards, use customer information only for authorized purposes, notify WE LLC as soon as possible—but no later than 72 hours after becoming aware of a qualifying breach involving a customer information system—and cooperate with WE LLC’s incident-response procedures.

WE LLC evaluates service providers based on the nature of their services and the customer information involved. Where relevant and available, the Firm reviews security documentation, contractual safeguards, incident-notification provisions, data-retention practices, and evidence of cyber-liability insurance. If a provider does not supply requested documentation or agree to a requested contractual provision, WE LLC documents the limitation, assesses the resulting risk, and implements appropriate monitoring or compensating controls. WE LLC remains responsible for making required determinations and providing timely notification to affected individuals.

Incident Response and Data Breach Notification

Consistent with the SEC’s 2024 amendments to Regulation S-P (17 C.F.R. § 248), WE LLC maintains a written incident-response program designed to detect, respond to, and recover from unauthorized access to or use of customer information. WE LLC implemented this program in advance of the June 3, 2026 compliance date applicable to smaller registered investment advisers.

If WE LLC determines that sensitive customer information has been, or is reasonably likely to have been, accessed or used without authorization, WE LLC will notify affected individuals in writing as soon as practicable, but no later than 30 days after becoming aware of the incident, unless an exception permitted by Regulation S-P applies. The notice will include the information required by Regulation S-P, including a general description of the incident; the date, estimated date, or date range, if known; the information involved; WE LLC contact information; steps taken by the Firm; protective measures individuals may take; and appropriate identity-theft resources.

Notice is not required if WE LLC determines, after a reasonable investigation, that sensitive customer information has not been and is not reasonably likely to be used in a manner that would result in substantial harm or inconvenience. WE LLC documents the investigation and the basis for that determination.

Recordkeeping

WE LLC maintains written records documenting compliance with Regulation S-P, including applicable policies and procedures, security incidents, investigations, response actions, determinations, and notifications. Records are retained in accordance with applicable SEC books-and-records requirements.

Annual Privacy Notice

WE LLC provides this Privacy Policy to prospective clients before establishing an advisory relationship, at onboarding, and annually thereafter while the advisory relationship continues. Clients will be notified promptly of any material change.

We’ll Keep You Informed

We may revise this Privacy Policy periodically and will provide a revised policy if changes materially alter the prior policy. We will not revise the policy to permit sharing of non-public personal information beyond what is described here unless we first provide any notice and opportunity required by applicable law. You may obtain a current copy by contacting WE LLC at 404-343-2060.

This Privacy Policy reflects the SEC’s 2024 amendments to Regulation S-P, including incident-response and customer-notification requirements applicable to registered investment advisers.