



**Wealth Engagement LLC**  
Privacy Policy

*Effective: January 1, 2026*

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**Our Commitment to You**

Wealth Engagement LLC (“WE LLC”) is committed to safeguarding the use of your personal information that we have as your Investment Advisor. WE LLC (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. 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 WE LLC 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. WE LLC provides this Privacy Policy to prospective clients prior to or at the time of establishing an advisory relationship, and to all clients at onboarding and upon any material change.

**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
- E-mail address
- Phone number
- Social security or taxpayer identification number
- Assets
- Income
- Account balance
- Investment activity
- Accounts at other institutions

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

- Information we receive on Brokerage Agreements, Managed Account 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 WE LLC Shares**

WE LLC 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. 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 WE LLC'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 administer 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 we have requested.

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

### **Information about Former Clients**

WE LLC 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 LLC maintains a separate Information Technology and Cybersecurity Policy that governs the firm's technical and administrative controls for the protection of client data.

### **Service Provider Oversight**

WE LLC exercises due diligence in the selection and ongoing monitoring of service providers that have access to client information. Our policies and procedures require that any service provider that accesses, maintains, processes, or otherwise handles customer information on our behalf must:

- Implement and maintain appropriate safeguards to protect customer information;
- Restrict use of customer information to the services being performed for WE LLC;
- Notify WE LLC in writing as soon as practicable, but no later than 72 hours, after discovering any breach or unauthorized access to customer information; and
- Cooperate fully with WE LLC's incident response and notification procedures following any such event.

Prior to engaging any new service provider with access to client data, WE LLC conducts due diligence to confirm the vendor has appropriate security controls, carries adequate cyber liability insurance, and can meet WE LLC's 72-hour breach notification requirement. WE LLC remains responsible for ensuring timely and compliant notification to affected clients even when service providers are involved in the delivery of such notices.

### **Incident Response and Data Breach Notification**

Pursuant to the SEC's 2024 amendments to Regulation S-P (17 C.F.R. § 248), WE LLC has established and maintains a written incident response program designed to detect, respond to, and recover from unauthorized access to or use of customer information. WE LLC has implemented this program in advance of the June 3, 2026 compliance date applicable to smaller RIAs (below \$1.5 billion AUM).

In the event 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 clients in writing as soon as practicable, but no



later than 30 days after becoming aware of the incident. The required notice will include:

- A description of the incident and the type of customer information involved;
- The date of the incident, to the extent known;
- Contact information for WE LLC for questions or further assistance; and
- Guidance on protective steps clients may take, including referral to applicable Federal Trade Commission resources.

Notice is not required if WE LLC reasonably determines that the information is not likely to result in substantial harm or inconvenience to affected individuals.

### **Recordkeeping**

WE LLC maintains written records documenting its compliance with Regulation S-P, including policies and procedures, documentation of any security incidents, records of incident investigations and response actions, and records of any notifications provided to affected clients. These records are retained in accordance with applicable SEC recordkeeping requirements.

### **Annual Privacy Notice**

WE LLC provides this Privacy Policy to prospective clients prior to establishing an advisory relationship and to clients at onboarding. Consistent with the FAST Act exception incorporated into the 2024 Regulation S-P amendments, WE LLC is not required to deliver an annual privacy notice if: (i) WE LLC shares non-public personal information with non-affiliated third parties only in circumstances permitted by applicable exceptions; and (ii) WE LLC has not changed its privacy policies or practices since the most recent notice delivered to clients. In the event of any material change to this policy, clients will be notified promptly.

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

Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not 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 404-795-6124 or 917-826-5955.

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*This Privacy Policy reflects the SEC's 2024 amendments to Regulation S-P (17 C.F.R. § 248), including mandatory incident response program and data breach notification requirements for registered investment advisers. WE LLC has implemented these requirements in advance of the June 3, 2026 compliance date applicable to smaller RIAs.*