

## Customer Privacy Notice

### WESTOVER CAPITAL ADVISORS, LLC

Updated: March 2026

Facts		What does Westover Capital Advisors, LLC (WCA) do with your personal information?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social security number</li> <li>▪ Date of birth</li> <li>▪ Income/assets</li> <li>▪ Driver's license/passport information</li> <li>▪ Transaction history</li> <li>▪ Account balances and account numbers</li> <li>▪ Investment objectives and risk tolerance</li> </ul> <p>As required by law, when you are <i>no longer</i> our customer, we will continue to hold your information and share it as described in this notice.</p>	
How?	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information, the reasons we choose to share, and whether you can limit this sharing.	

Reasons we can share your personal information	Does WCA Share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transactions, determine your suitability for services and maintain your account(s).	<YES>	<NO>
We share your personal information with the firm's attorneys, accountants and auditors or others determining compliance with industry standards or to respond to court orders and/or legal investigations.	<YES>	<NO>
For our marketing purposes – information about you with third parties to offer our products and services to you.	<NO>	<We do not share>
For our affiliates' everyday business purposes - information about your transactions and experiences.	<YES>	<YES>

<b>Questions?</b>	<p>WESTOVER CAPITAL ADVISORS, LLC            1013 Centre Road, Suite 405            Wilmington, Delaware 19805 U.S.A.            Phone Number: 302-427-9600            Attn: Matthew C. Beardwood</p>
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## Who We Are

Who is providing this notice?	Westover Capital Advisors, LLC conducts advisory business under the name Westover Capital Advisors, LLC (“WCA”).
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## Definitions

Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. Affiliates include: <ul style="list-style-type: none"><li>• Westover Capital Tax Services, LLC</li><li>• American Incorporators, Ltd.</li><li>• Registered Agents Legal Services, LLC</li></ul>
Non-Affiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. Non-affiliates we may share information with include custodians, broker-dealers, technology providers, and other service providers necessary to service client accounts or comply with legal obligations.
Joint Marketing	A formal agreement between non-affiliates financial companies that together market financial products or services to you: WCA does not jointly market with other financial companies

## Other Important Information

### Information for California, North Dakota, and Vermont Customers:

In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.

California, North Dakota, and Vermont Clients have other protections under state law. If your primary mailing address is in California or Vermont, we will not share your credit or financial information that we collect except as permitted by law, including, for example, with your consent or to service your account. We will also not use your information for joint marketing purposes. We do not share client information with third parties except as permitted by law.

California residents may be eligible to exercise consumer privacy rights under the California Consumer Privacy Act or “CCPA” (Cal Civ. Code §1798.100 et seq.). This notice is provided according to the CCPA, and, if eligible, you may exercise the following rights. You have the right to know about the personal information collected, disclosed, or sold. Please contact as directed above. We may collect information about your employment, financial, location, and government-issued information. We may obtain personal information directly from the individual or government entities to provide, maintain and service your account(s). We may also utilize this information for:

- compliance/legal and regulatory purposes
- identity protection/fraud prevention/safety and security
- client concerns/complaints

We may provide information to the following third (3rd) parties to process transactions and maintenance of accounts:

- Service providers
- Operating systems and platforms
- Government entities
- Data analytics

Nevada residents may request placement on our internal do-not-call list by calling (262) 754-5299. For more information, contact the Nevada Attorney General's Office, Bureau of Consumer Protection, 555 E. Washington Street, Suite 3900, Las Vegas, Nevada 89101.

## What We Do

<p>How does WCA protect my personal information?</p>	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These include administrative, technical, and physical safeguards and written policies reasonably designed to safeguard customer information consistent with Regulation S-P.</p> <p>Under amended Regulation S-P, WCA maintains written incident response procedures designed to detect, respond to, and recover from data security incidents. If sensitive customer information is accessed or used without authorization and notification is required under federal law, WCA will provide notice as soon as practicable and no later than 30 days after discovery.</p> <p>Finally, our firm maintains policies governing the secure disposal of customer information when it is no longer required to be retained under applicable legal or regulatory requirements.</p>
<p>How does WCA collect my personal information?</p>	<p>We collect your personal information when you open an account, engage our firm for advisory services, enter into agreements, or communicate with us.</p> <p>We may share or retrieve information from auditors, consultants, tax preparers, attorneys, regulators, and other service providers as necessary to provide services or comply with legal obligations. WCA does not obtain credit reports from consumer reporting agencies. WCA does not obtain or use credit reports from consumer reporting agencies.</p>
<p>Why can't I limit all sharing?</p>	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"><li>▪ Sharing for affiliates' everyday business purposes—information about your creditworthiness</li><li>▪ Affiliates from using your information to market to you</li><li>▪ Sharing for non-affiliates to market to you</li></ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
<p>What happens when I limit sharing for an account I hold jointly with someone else?</p>	<p>Your choices will apply to everyone on your account.</p>