

PRIVACY NOTICE

What does Clearwater Advisors do with your personal information?

Clearwater Advisors, LLC ("Clearwater") is committed to maintaining the trust and confidence of our customers. We want you to understand how we protect your privacy when we collect and use information about you, and the measures we take to safeguard that information. Please read this notice carefully to understand what we do. Keeping customer information secure and private is a priority for us.

This privacy notice sets forth the policies of Clearwater for the collection, use, storage, sharing, disclosure (collectively, "processing") and protection of personal data relating to current, prospective and former clients. Please take a moment to review it and feel free to contact us with any questions. Thank you for the trust you have placed in us. We look forward to working very hard to continue to earn your trust.

What types of non-public personal information do we collect about you?

The categories of personal information we may collect include names, residential addresses or other contact details, signature, nationality, tax identification number, date of birth, place of birth, copies of identification documents, bank account details, information about assets or net worth, types and amounts of investments, transactions, and income, or other sensitive information.

How do we collect your non-public personal information?

We may collect personal information about you through: (i) information provided directly to us by you, or another person on your behalf; (ii) information that we obtain in relation to any transactions between you and us; (iii) information obtained when verifying the information you provide on applications or other forms; (iv) information from third parties or other sources.

How do we may share your non-public personal information?

We do not sell, share or disclose your non-public personal information to non-affiliated third party marketing companies. If we have a non-disclosure agreement or confidentiality agreement with you, we adhere strictly to its terms.

We may disclose non-public personal information about you to non-affiliated third parties under circumstances as permitted or required by law. These disclosures typically include information to process transactions on your behalf, to conduct our operations, to help ensure compliance with applicable legal or regulatory requirements, to follow your instructions as you authorize, to respond to court orders and legal investigations, and to protect the security of our financial records.

101 S. Capitol Blvd Suite 1201 Boise, ID 83702 phone 208.433.1222 fax 208.278.1282 www.clearwateradvisors.com

Why can't all sharing be limited?

Federal law gives you the right to limit only 1) sharing for affiliates' everyday business purposes - information about your creditworthiness; 2) affiliates from using your information to market to you; and 3) sharing for nonaffiliates to market to you. State laws and individual companies may give you additional rights to limit sharing.

How do we protect the confidentiality and security of your non-public personal information?

Keeping your information secure is one of our most important responsibilities. We restrict access to non-public personal information about you to those employees and agents who need to know that information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your non-public personal information.

What is our policy relating to former customers?

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

We reserve the right to change this policy at any time and you will be notified if any changes occur.

If you have any questions after reading this Privacy Policy, please contact us.