

Wealthcare Capital Management – Privacy Policy
Effective January 1, 2026

Wealthcare Capital Management LLC and its DBA's or divisions ("WEALTHCARE") have adopted policies and procedures to protect our client's non-public personal information.

As your investment adviser, or service provider to your investment adviser, WEALTHCARE collects non-public personal information about you from unaffiliated third-party investment custodial applications and other forms submitted to us by you or submitted to us by your financial consultant, custodian, or other authorized representatives (such as your accountant or attorney) and through the normal course of business as your investment adviser or as a service provider to your investment adviser.

The types of non-public personal information WEALTHCARE collects and shares will depend on the product or services you receive from us. WEALTHCARE regards non-public personal information to be data such as your name, address, telephone/fax numbers, email addresses, Social Security number, assets, income, investment objectives, risk tolerance, account numbers, account balances, transaction history, beneficiary information, bank account information and credit card information.

WEALTHCARE will not disclose non-public personal information about you to anyone, except:

1. For our everyday business purposes – such as to process your transactions or maintain and monitor your account(s),
2. To non-affiliated third parties who assist us in administering your investment account(s) – such as your brokerage, mutual fund, or other investment custodian(s),
3. In connection with a government or self-regulatory organization request or investigation,
4. For our marketing purposes – to offer *our* services to you,
5. With Broker-Dealers who have regulatory requirements to supervise certain of your Advisor's activities, and
6. In connection with certain financial advisor transitions, which are described in greater detail below.

WEALTHCARE restricts access to your personal and account information to those employees who need to know that information to provide services to you, your financial consultant, or other authorized representative. Employees and third-party vendors/contractors governed by confidentiality agreements are prohibited from disclosing non-public personal information to any person or entity outside WEALTHCARE during or subsequent to their employment or contractual engagement with WEALTHCARE.

Additionally, WEALTHCARE maintains physical, electronic, and procedural safeguards that meet federal and/or state standards to guard your non-public personal information.

WEALTHCARE's privacy policy applies to current, future, and past clients. If you decide to close your account(s) or become an inactive client, WEALTHCARE will adhere to the privacy policies and practices as described in this notice. If there is a material change in WEALTHCARE's privacy policy, you will be notified via written notice.

Also, if your financial advisor had a client relationship with you prior to your relationship with WEALTHCARE, then WEALTHCARE may have agreed to allow your financial advisor to solicit or recruit you to join his or her new firm if the financial advisor's relationship with WEALTHCARE is terminated. In those instances, your financial advisor will be permitted to take your personal information and other account information to their new firm.

Please be aware that WEALTHCARE entered into the Protocol for Broker Recruiting (Protocol) on April 24, 2009, with certain other brokerage firms, and if WEALTHCARE remains a signatory to the Protocol as of the effective date of your advisor's termination from WEALTHCARE, then WEALTHCARE may permit your financial advisor to take your name, address, phone number, email address and the account title of the accounts serviced (or additional information as permitted if the Protocol is amended) while your financial advisor was associated with WEALTHCARE if your advisor joins one of these Protocol firms. The retention of this limited information by your advisor under the Protocol may occur even if you have exercised your rights to limit information sharing as described below.

If you would like to limit the personal information that your financial advisor could disclose or take if he or she moved to another brokerage or investment advisory firm and terminated their relationship with WEALTHCARE, please send a written request by email to compliance@wealthcarecapital.com with the subject of "PRIVACY OPT OUT." You can withdraw your opt-out choice at any time by contacting us in writing at the email address provided above. Please note that for accounts held jointly by two or more persons, the privacy choices made by any account holder apply to all joint holders with respect to the account.

If your primary address is in a state that requires your affirmative consent to share your personal information with a new firm, then you must give your written consent before we will allow your financial advisor to take any of your personal information to that new firm. As of the date of this notice, if your 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.

If you have any questions regarding this privacy policy, please do not hesitate to call your financial consultant or call WEALTHCARE's Compliance Department at (804) 644-4711, or send an email inquiry to compliance@wealthcarecapital.com