

<b>FACTS</b>	<b>WHAT DOES INNEALTA CAPITAL, LLC DO WITH YOUR PERSONAL INFORMATION?</b>
<b>Why?</b>	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.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>▪ Social Security number and employment information</li> <li>▪ Account balances and transaction history</li> <li>▪ Credit history, income and investment experience</li> </ul>
<b>How?</b>	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons Innealta Capital, LLC (“Innealta”) chooses to share; and whether you can limit this sharing.

<b>Reasons we can share your personal information</b>	<b>Does Innealta share?</b>	<b>Can you limit this sharing?</b>
<b>For our everyday business purposes</b> — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	<b>Yes</b>	<b>No</b>
<b>For our marketing purposes</b> —to offer our products and services to you (please see below to limit the ways in which we contact you)	<b>Yes</b>	<b>No</b>
<b>For joint marketing with other financial companies</b>	<b>No</b>	<b>We don’t share</b>
<b>For our affiliates’ everyday business purposes</b> — information about your transactions and experiences	<b>No</b>	<b>We don’t share</b>
<b>For our affiliates’ everyday business purposes</b> — information about your creditworthiness	<b>No</b>	<b>We don’t share</b>
<b>For our affiliates to market to you</b>	<b>No</b>	<b>We don’t share</b>
<b>For nonaffiliates to market to you</b>	<b>No</b>	<b>We don’t share</b>

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>▪ Call (737) 808-4640 or email consulting@innealtacapital.com</li> </ul> <p><b>Please note:</b>                      If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we can continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
<b>Questions?</b>	Call (737) 808-4640 or email consulting@innealtacapital.com

Who we are	
<b>Who is providing this notice?</b>	Innealta Capital, LLC. This notice applies solely to your Innealta account(s). Other Innealta accounts may be covered by a different privacy notice received in connection with those accounts.

What we do	
<b>How does Innealta protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does Innealta collect my personal information?</b>	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> <li>▪ Open an account, provide employment information or make deposits or withdrawals from your accounts</li> <li>▪ Seek advice about your investment(s)</li> <li>▪ Your completion of subscription forms for our products</li> <li>▪ Give us your income information</li> <li>▪ During communications between you and our representatives</li> <li>▪ From our conduct of marketing activities which may include requests for more information for example competitions or requesting 'business cards'</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<b>Why can't I limit all sharing?</b>	<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 nonaffiliates 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>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply individually unless you tell us otherwise. Any account holder may express a privacy preference on behalf of the other joint account holders.

Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and non-financial companies. Our affiliates include:</p> <ul style="list-style-type: none"> <li>▪ Innealta Capital, LLC does not have any affiliated companies through common ownership or control (directly or indirectly).</li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> <li>▪ Innealta Capital, LLC does not share with nonaffiliates so they can market to you.</li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ Innealta Capital, LLC does not jointly market.</li> </ul>

Other important information	
<b>Important Notice about Credit Reporting:</b> We may report information about your account(s) to credit bureaus and/or consumer reporting agencies. Late payments, missed payments, or other defaults on your account(s) may be reflected in your credit report and/or consumer report.	
<b>State Laws:</b> We follow state law if state law provides you with additional privacy protections. For example, we automatically treat customers with a Vermont mailing address as having limited our sharing with affiliates and nonaffiliates, unless you give us authorization for such sharing.	
<b>Trust or fiduciary accounts:</b> Trust or fiduciary accounts for which Emergent is the trustee or service provider, including employer-sponsored retirement accounts, are protected under special rules of confidentiality. Information on these accounts is not shared for marketing purposes without specific consent.	