

## **WELA STRATEGIES, INC PRIVACY NOTICE**

Wela Strategies values our customers and makes it a top priority to safeguard the confidential information of our customers. We are committed to protecting your privacy and maintaining your trust and confidence.

Wela Strategies collects information about you to assist us in providing services and products to help you meet your financial goals and objectives and provide high standards of customer service. Additionally, information is obtained from you in order to help us fulfill our legal and regulatory requirements. Information collected may vary depending on the products and services requested and the scope of your engagement with us.

### **Information Collected About You**

Wela Strategies collects nonpublic personal information about you from the following sources:

- ◆ Information provided on applications and related forms, such as name, address, telephone number, Social Security or Tax Identification number, birth date, net worth, annual income, information about your personal finances, financial information such as bank accounts, and medical information if insurance services are provided.
- ◆ Information about your transactions with us, such as account balances, payment history, account numbers, and account activity.
- ◆ Information from non-affiliated third parties, such as your employer, association, or benefit plan sponsor regarding any group products we may provide or assist in reviewing on your behalf.

We do not disclose information to nonaffiliated third parties about our current or former customers, except as permitted by law. However, should for any reason our policy change, we will notify you by providing you with an amended Privacy Notice prior to making any disclosure, not specifically permitted by law, of your nonpublic information to nonaffiliated third parties.

### **Policies and Practices to Protect Your Personal Information**

We train our staff to take precautions in handling personal information. We restrict access to nonpublic information about you to staff that need to know such information in order to provide the services for which you have engaged us, who assist in providing products and services to you, or who assist in the administration of the office, in order to maintain confidentiality of your information. Limited access is given to nonaffiliated third parties, as permitted by law, in order to execute securities transactions on your behalf, or in order to provide account maintenance or customer service on your accounts. We maintain physical, electronic and procedural safeguards to protect your nonpublic personal information. This includes measures to protect your information in the course of its disposal.

If you close your account, cease services with us, or become an inactive customer, we will continue to adhere to the privacy notice disclosed herein, unless we notify you by providing an amended Privacy Notice.

## **Disclosure of Personal Information**

We may disclose personal information obtained from you to financial service providers that service or provide support to your accounts, as permitted under law, such as:

- ◆ Securities broker/dealers.
- ◆ Third-party administrators and vendors hired to effect, administer, or enforce transactions or services in your accounts.

We will not share information about you with nonaffiliated third parties, unless we have provided you with an updated Privacy Notice and provided you with an opportunity to approve or disapprove of the sharing of your information.

Our “affiliates” are companies with which we share common ownership<sup>1</sup>. We will share your information with one or more of our affiliates only if necessary to provide the services for which you have engaged our firm.

Additionally, we may be required by law or regulation to disclose information to third parties such as in response to a subpoena, to prevent fraud, to comply with rules and regulations to which we are subject or in response to inquiries from industry regulators.

We will affirm our Privacy Notice annually in writing, provided you maintain an ongoing relationship with us.

*Updated as of March 2017*

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<sup>1</sup> Current Affiliates: (1) Capital Investment Advisors, LLC; (2) Capital Accounting & Tax, Inc.; (3) Capital Administration, LLC