

Steward Inc.

PRIVACY NOTICE

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information.

Information We Collect: In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us or others (such as the types of investments you have made and your account status); and
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.
- Information you provide related to your employment or business activities, which may include sensitive or proprietary information such as compensation, fundraising plans, valuations, contemplated or confidential transactions, financial models, liquidity planning, or other business-performance or strategic information.

Steward does not sell your personal information or customer lists. We disclose your non-public personal information only as described in this Privacy Notice and as permitted or required by law (for example, to service your accounts or respond to regulatory requests).

Categories of Information We Disclose: We may only disclose information that we collect in accordance with this policy.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account at Steward without your prior written consent, except as described in this Privacy Notice and as permitted or required by law.

If you provide written consent via our investment advisory agreement, we may disclose information:

- To third parties that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer (e.g., Altruist, Schwab), financial planning and tax software providers (e.g. RightCapital, Holistiplan), or insurance company. Such parties are contractually required to safeguard your information and we will only share where such providers maintain industry-standard security controls, including encryption and MFA;
- Your authorized representatives (such as your attorney, trustee, insurance broker or anyone else who represents you in a fiduciary capacity);
- Our professional advisers (such as our attorneys, accountants or auditors); and
- Government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

Text Messaging: No mobile information will be shared with third parties for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

How We Use Information: Steward does not use client information for marketing, product development, or analytics purposes, nor does it share information with any third party for such purpose. Information may be used among companies that perform support services for us, such as data processors, technical systems consultants and programmers, or companies that help us send Steward communications to you (such as email service providers), but **not** for their own marketing or product development purposes, such as:

- **To protect your accounts** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a custodian providing services to you and/or Steward
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;
- **To keep you informed** about financial services of interest to you.

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation. Steward does not have corporate affiliates. Steward does not receive information regarding marketing eligibility from affiliates to make solicitations.

Regulation S-ID: Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to customers or to the safety and soundness of our firm from identity theft. We have developed an ITTP to adequately identify and detect to prevent and mitigate identity theft.

Our Security Policy: We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information. Our employees are trained on their responsibilities regarding safeguarding client information. Steward maintains internal access controls and removes access promptly upon personnel termination.

Your Right to Opt Out: Federal law gives you the right to limit some but not all sharing of your personal information. Steward does not have affiliates and does not share your personal information with non-affiliated third parties for their own marketing purposes. As a result, there is no additional action you need to take to limit our sharing.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you. Upon termination of the client relationship, Steward will retain records only as required by applicable law and regulation. Upon your written request and to the extent permitted by law, Steward will securely delete Confidential Client Information not required to be maintained.

Questions or Complaint Notification: Please direct questions or complaints to Steward CEO Ami Shah at ami@oursteward.com

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at the aforementioned contact information. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.