

PRIVACY POLICY
Wealth Innovations (DBA)
Fortitude Advisory Group, LLC
(Collectively "Fortitude")

Effective: October 1, 2023

Fortitude is committed to protecting the privacy and confidentiality of your non-public, personal information. In this notice, the words "you" and "customer" are used to mean any individual who obtains or has obtained a financial product or service (Services) from Fortitude as a provider of Services that involve compiling personal and sometimes, sensitive information. Protecting the confidentiality of that information has been, and will continue to be, a top priority for Fortitude. Whether you are a current customer, former customer, or potential customer, we believe that you should know about the information we collect, the measures we take to safeguard it, and the limited circumstances in which we may share your information.

1. We collect only the customer information necessary to consistently deliver our Services to you. The information we collect and the extent to which we use it will vary depending on the Services for which you subscribe or purchase. Fortitude collects information that helps us serve your financial needs, allowing us to provide a high levels of customer service; develop and offer new Services for our customers and potential customers; and allows us to fulfill any legal and/or regulatory requirements imposed on us. The information collected generally varies depending on the Services you subscribe to or purchase and may include, but are not limited to:
 - Information provided on applications and related forms (i.e., your name, date of birth, home address, Social Security Number, account number, annual income and other non-public personal information);
 - Responses from your employer, benefit plan sponsor, or any other association regarding any Service we may provide to you. (i.e., your name, date of birth, home address, Social Security Number, annual income and other non-public personal information);
 - Third-party reports, such as consumer credit history, motor vehicle records, demographic and/or medical information, if relevant to your Service; and
 - Information about your relationship with us, such as Services purchased, and/or account numbers and balances.
2. We maintain safeguards to protect your privacy and information security. We have implemented security standards and processes, including physical, electronic and procedural safeguards. We limit access to customer information to employees, investment advisor representatives or agents who may need it to fulfill their obligation to you for the Services for which you have subscribed or purchased. These individuals are trained to respect the confidentiality of your personal information and understand their duty to safeguard it.
3. We restrict the sharing of customer information for use in marketing. First and foremost, we do not sell or share customer information with outside parties who want to market their products or services to you. We may disclose your non-public personal information to companies with which we share common ownership and

with institutions with which we have joint marketing agreements. We have confidentiality agreements in place with such companies.

As a provider of a wide variety of Services, we may identify opportunities to enhance customer service or to offer you additional Services offered by Fortitude. However, Fortitude will not share information about you with others that could be used to make insurance underwriting or lending decisions about you, unless you direct us to or unless we notify you first and give you a chance to opt-out. In addition, we will not use certain non-public, personal information (such as income, account history or credit history) received from any affiliate in order to market its products or services to you unless you direct us to, or unless we notify you first and give you a chance to opt-out. Similarly, we will not share non-public, personal information with third-party financial services entities, such as banks, credit unions, credit union service corporations, insurance companies, or securities, broker/ dealers, for purposes of joint marketing unless you direct us to, or unless we notify you first and give you a chance to opt-out.

We share customer information as necessary for business, regulatory, and servicing purposes. We will share customer information to facilitate or service a transaction you have requested, but only in accordance with all applicable federal and/or state laws. For example:

- In some cases, your information (i.e., your name, home address, date of birth, and Social Security Number, account number and other non-public personal information) may be provided to other affiliates of Fortitude, to process or service a transaction you have requested or to facilitate enhanced customer service;
- We may share or exchange information with companies engaged to work with us, such as third-party administrators and vendors hired to effect, administer or enforce a transaction or service that you request or authorize; to develop or maintain software; to perform marketing research; or to provide us with demographic information to develop marketing plans. We require these companies to maintain the confidentiality of customer information and use it only for the purpose for which it was provided;
- We may provide information to reputable consumer reporting agencies in connection with your application or renewal of any Services subscribed or purchased;
- We may also share customer information in compliance with any federal or state law, statute or regulation (i.e., in response to a subpoena, to prevent fraud, and to comply with rules of, or inquiries from industry regulators or law enforcement); and
- In addition, the investment advisor representative with whom you work with to obtain Services may use the personal information about you in his or her own files to advise you of other products or to help you with your overall financial strategy.

We will reaffirm this policy annually in writing, as long as you maintain an ongoing relationship with Fortitude or any of its affiliates. We recognize that your relationship with your investment advisor representative is important.

- If you are a participant of an employer-sponsored plan, your investment advisor representative may be under an agreement that restricts the transfer of your personal information and/or your employer sponsored plan account to any new firm.

- Should your investment advisor representative decide to transfer his or her registration to another firm, your investment advisor representative may wish to continue to service your account(s) at the new firm. With your authorization, and in accordance with Regulation S-P, which covers the manner and use of, privacy and safeguarding of your personal information, your investment advisor representative may take your personal information to the new firm.
- Opting Out – ***If either your investment advisor representative or your financial institution transfers to another firm and you do not want Fortitude to share or disclose your personal financial information to that new firm, please contact us at 253-470-4977 to opt out.***
- Opting In – If your primary address is in a state that requires your affirmative consent to share your personal financial information with your investment advisor representative's new firm, then you must give your written consent before such information will be shared. Currently, the states that require affirmative consent are: Alaska; California; Illinois; Maine; Massachusetts; Missouri; New Hampshire; North Dakota; and, Vermont. This list of states is subject to change without notice.

Online Privacy

This privacy statement describes how Fortitude uses and protects personal information it collects from individuals who use this site. Material changes to this privacy policy will be posted here. Your continued use of this site after any changes are posted will be considered acceptance of those changes.

Your Personal Information

Fortitude generally records certain usage information, such as the number and frequency of visitors to its website. This information may include the sites that you access immediately before and after your visit to its website, the internet browser you are using, and your IP address. If Fortitude uses such data at all, it will be on an aggregate basis, and Fortitude will not disclose to third parties any information that could be used to identify you personally. In order to obtain access to certain services provided via its website and request certain information regarding Fortitude via its website, you may be required to provide personally identifiable information such as your name, postal address, e-mail address, telephone number, facsimile number and investor status. You can choose not to provide this information, but then you might not be able to gain access to such information and services.

Security

Fortitude shall exercise commercially reasonable efforts to maintain the confidentiality of all information provided in connection with your use of its website. However, Fortitude cannot guarantee the security of your personally identifiable information.

Use of Cookies and web beacons

Fortitude does not employ cookies nor web beacons at its website.

Third-Party Sites

The Fortitude website may link to other Internet sites controlled by third parties not affiliated with Fortitude. These sites may have privacy statements that differ from this privacy statement. You should review the privacy statement of any third party site you access from this site. Please be aware that Fortitude is not responsible for the security, content or privacy policies of such other sites.

If you have any questions regarding the information in this Privacy Policy, please contact us at 7195 Wagner Way NW, Suite #104, Gig Harbor, WA 98335. Telephone number: (253) 470-4977. Fortitude Advisory Group, LLC is an SEC registered investment adviser. To learn more, visit www.sec.gov