

Innealta Capital, LLC (“Innealta”) is located at 13215 Bee Cave Pkwy Building A, Austin, Texas 78738. Telephone: 808-737-4640.

We work hard to protect your personal information and ensure your information is kept private and secure. The following privacy policy outlines the types of personal information that we collect, including through our websites, our original articles, our iOS mobile application and our Android mobile applications, if applicable. It also explains why we collect your information and how we use it. Privacy is important to us. We will never rent or sell your information to anyone. If you have any questions or if you believe that we have not adhered to this policy, please send us a note at consulting@innealtacapital.com.

FACTS	WHAT DOES INNEALTA CAPITAL, LLC DO WITH YOUR PERSONAL INFORMATION?
Why?	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.
What?	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"> ▪ Social Security number and employment information ▪ Account balances and transaction history ▪ Credit history, income and investment experience
How?	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.

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

To limit our sharing	<ul style="list-style-type: none"> ▪ Call +1 (737) 808-4640 or email consulting@innealtacapital.com Please note: 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.
Questions?	Call +1 (737) 808-4640 or email consulting@innealtacapital.com

Who we are	
Who is providing this notice?	Innealta Capital, LLC. This notice applies solely to your Innealta account(s).

What we do	
How does Innealta protect my personal information?	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.
How does Innealta collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> ▪ Open an account, provide employment information or make deposits or withdrawals from your accounts ▪ Seek advice about your investment(s) ▪ Your completion of subscription forms for our products ▪ Give us your income information ▪ During communications between you and our representatives ▪ From our conduct of marketing activities which may include requests for more information for example competitions or requesting 'business cards' <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> ▪ Sharing for affiliates' everyday business purposes — information about your creditworthiness ▪ Affiliates from using your information to market to you ▪ Sharing for nonaffiliates to market to you <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>
What happens when I limit sharing for an account I hold jointly with someone else?	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	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. Our affiliates include: <ul style="list-style-type: none"> ▪ Acclivity Investment Research, LLC
Nonaffiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> ▪ Innealta Capital, LLC does not share with nonaffiliates so they can market to you.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ▪ Innealta Capital, LLC does not jointly market.

Other important information	
Important Notice about Credit Reporting: 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.	
State Laws: 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.	
Trust or fiduciary accounts: 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.	