

ALBA Financial LLC PRIVACY POLICY (*PPOL*)

Protecting the privacy and confidentiality of our client's information is of utmost importance to ALBA Financial LLC, a registered investment advisor firm. This client privacy policy ('PPOL') outlines how we collect, use, and safeguard client information and demonstrates our commitment to maintaining the privacy and security of personal data.

COLLECTION AND USE OF CLIENT INFORMATION

- 1. Personal Information
 - We collect and maintain personal information about our clients, such as names, contact details, financial information, and other relevant data necessary for providing investment advisory services.
 - Personal information is collected through client applications, agreements, discussions, and other interactions.
- 2. Purpose of Information Collection
 - The client information we collect is used for the purpose of providing investment advisory services, maintaining client accounts, and complying with legal and regulatory requirements.
 - We may also use client information to communicate important updates, deliver requested information, and provide personalized services.

PROTECTION AND CONFIDENTIALITY OF CLIENT INFORMATION.

- 1. Safeguarding client information
 - We have implemented physical, electronic, and procedural safeguards to protect information from unauthorized access disclosure, alterations, or destruction.
 - Access to client information is limited to authorized personnel who require it to perform their duties.
- 2. Confidentiality Obligations
 - All employees, contractors, and associated persons of ALBA Financial LLC are required to adhere to strict confidentiality obligations. If an
 employee who is an investment advisor representative leaves the firm, there is certain information they may still be able to hold on you.
 Please notify us in writing if you wish that information not to be taken by the investment advisor representative.
 - Client information is treated as confidential and is not disclosed to any third parties, except as permitted by law or with client consent.

SHARING OF CLIENT INFORMATION

- Authorized Disclosures
 - We may disclose certain information to certain third parties, such as custodians, brokers, and service providers, who assist us in delivering investment advisory services.
 - These third parties are contractually obligated to maintain the confidentiality and security of client information.
- 2. Legal and Regulatory Requirements
 - In certain circumstances, we may be required to disclose client information to comply with legal, regulatory, or governmental requests or to protect our rights, property, or safety.

CLIENT RIGHTS AND CHOICE

- 1. Access and Correction
 - Clients have the right to access and review their personal information held by ALBA Financial LLC.
 - If any information is inaccurate or incomplete, clients have the right to request corrections and/or updates.
- 2. Opt-Out Choices
 - Clients may choose to opt-out of receiving certain communications from ALBA Financial LLC, such as marketing materials or newsletter.
 Clients may also opt-out of information sharing with ALBA Financial LLC's third party affiliates, excluding those under common ownership, providing it would not affect the normal course of business and prevent ALBA Financial LLC from carrying out its due diligence.
 - Opt-out instructions are provided in the relevant communications or can be requested directly from our firm at albafinanciallic@gmail.com

POLICY UPDATES

The PPOL may be updated periodically to reflect changes in legal or regulatory requirements or to incorporate improved privacy practices.

CONTACT INFORMATION

If clients have any questions or concerns regarding this PPOL or the privacy of their information, they can contact ALBA Financial LLC using the following contact details:

Robert Dodson (402) 305-6732 Rob@albafinanciagroup.com albafinancialllc@gmail.com 736 Forest Dr, Council Bluffs, IA 51503

Approved By: ALBA Financial LLC, September 1st, 2023.