



ALPHAWAVE FINTECH

MEETING YOU WHERE YOU ARE

PRIVACY POLICY

This notice is being provided to you in accordance with the SEC's Regulation S-P rule (Privacy of Consumer Financial Information). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your non-public personal information.

This Policy describes how Alphawave Fintech collects, uses, and shares personal information when we provide services to clients. Alphawave Fintech is a DBA that also refers to Alphawave Investments, LLC., a registered investment advisor that provides investment advisory, portfolio management, financial consulting, and retirement planning. Alphawave Fintech and Alphawave Investments, LLC. may be referred to as a "Alphawave," "the company," "we," or "us."

Any person or entity to whom Alphawave Fintech provides or provided services or products is a "client." Prospects who share personally identifiable information with Alphawave Fintech are also treated as clients under the Privacy Policy.

INTRODUCTION

Financial companies choose how they share consumer's personal information. Federal law gives consumers the right to limit some, but not all, sharing. Federal law also requires Alphawave Fintech to tell clients what we do with their personal information. This Policy describes how Alphawave Fintech collects, uses, and protects client's personal information when we provide services to clients and describes how we collect and use information when Users use the Website as well as Terms of use of the Website. Please read this notice carefully to understand what we do.

COLLECTING INFORMATION

Alphawave Fintech collects personally identifiable information from clients in the course of providing services and determining investment objectives. The types of personal information collected and shared depend on the services and products provided to the client. Information can include, but is not necessarily limited to, name and date of birth, social security number, marital status, contact information, account numbers, transaction history, income, payment history, employment history, assets, investment experience, risk tolerance, and account information, retirement assets, retirement planning, and family information. Our Firm strives to maintain accurate personal information in our client files at all times. However, as personal situations, facts, and data change over time; we encourage our clients to provide feedback and updated information to help us meet our goals. The information we gather may include:

- Information we receive from you on applications or other forms.
- Information about your transactions with us or our affiliates.
- Information we receive from a consumer reporting agency.

SHARING INFORMATION

Alphawave Fintech stores, processes, maintains, and uses our clients' personally identifiable information in order to provide clients support and services. We do not disclose any non-public personal information about our customers or former customers to anyone, except as permitted or required by law, or as necessary to establish and manage accounts for you. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain non-affiliated third parties such as our attorneys, accountants, auditors, and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all non-affiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

Alphawave Fintech may share such information:

- To complete transactions directed, authorized, or requested by the client;
- To provide services to the client;

- To contractors, vendors, and other third parties Alphawave Fintech uses to support our business and to provide services to clients, with those contractors, vendors, and third parties bound by contractual obligations to keep the information confidential and use it only for the purposes for which it was disclosed to them;

As required by applicable law;

- In circumstances we believe it is necessary to investigate, prevent, or react to illegal activities, suspected fraud, or violations; and
- With affiliates (i.e., a company under common control with said Alphawave Fintech Provider) for their everyday business purposes if about clients' transactions and experiences.

Clients cannot limit the above sharing.

Alphawave Fintech may share clients' information with affiliates so that they may market to the clients. Federal law gives clients the right to limit such sharing. State laws may give clients additional rights to limit sharing. Please contact alphawavefintech@outlook.com to request to limit sharing.

Alphawave Fintech does not jointly market with non-affiliates and does not share information with non-affiliates to market to clients, although we may refer clients to a non-affiliate who a client may contact at their discretion. We do not share phone numbers collected for SMS consent with third parties or affiliates for marketing purposes.

SECURITY

Alphawave Fintech takes commercially reasonable steps to protect clients' information from loss, misuse, unauthorized access, disclosure, or destruction in accordance with applicable law. No Internet, e-mail or electronic operating system is ever fully secure or error free, so please take care in deciding what information you provide to us.

Please note that we do not send emails to clients requesting billing, login, user ID or password information. If a client receives an email requesting personal or account information, login, or passwords purporting to be from Alphawave Fintech, we strongly advise clients to verify such communication is from us. We ask that clients report any suspicious communications to us.

We restrict access to non-public personal information about you to those Employees who need to know that information to provide financial services to you. We consider the level of risk that client information may be misused, altered, stolen, or destroyed, and maintain physical, electronic, and procedural safeguards that comply with federal standards to guard each client's personal financial information. The safeguards include:

- Ensuring the security and confidentiality of client records and information.
- Protecting against any anticipated threats or hazards to the security or integrity of client records and information.
- Protecting against unauthorized access to, or use of, client records or information that could result in substantial harm or inconvenience to any client.
- Hard copies of client personal and non-personal financial information including information contained on suitability form will be maintained in the Company's files, and will be secured (locked) after normal business hours.
- Electronic access to client personal financial information will be restricted to the Client's Investment Advisor Representative(s) (IAR), the Chief Compliance Officer (CCO), and other authorized individuals the CCO determines need access.
- All Associated Persons will be informed of the Company's delivery procedures, security safeguards and destruction/disposal procedures.

Alphawave Fintech takes commercially reasonable steps to ensure that information remains secure when it is disposed of after it is no longer required to be maintained. Such steps shall include shredding paper documents and records prior to disposal, requiring off-site storage vendors to shred documents maintained in such locations prior to disposal, and destroying data contained on electronic media in such a manner that the information can no longer be read or reconstructed.

As general policy, the Firm has adopted a procedure of shredding items that have been deemed outdated or unnecessary by associated persons during the course of their review of client files (typically older than 7 years). Additional items that require shredding include draft work papers or any other document that has any personal identifiable information on it.

MODIFICATIONS

We may, in our sole discretion, modify the Privacy Policy from time to time. If we make material modifications, we will notify all our clients as required by applicable law.

TRAINING

The Company will provide guidance and periodic training to employees relating to information security risks and responsibilities. We will retain documentation of the agenda of those training sessions and the topics covered. We will also retain a dated list of the employees who received such training.

IDENTITY THEFT

Alphawave Fintech strives to: (a) ensure the security and confidentiality of current and former client records and information; (b) protect against any anticipated threats or hazards to the security or integrity of current and former client records and information; and (c) protect against unauthorized access to or use of current and former client records and information that could result in substantial harm or inconvenience to any current and former client. Accordingly, the following procedures will be followed:

- When providing copies of information to others, Associated Persons shall ensure non-essential information is removed and that non-public personal information not relevant to the transaction is removed or redacted.
- The practice of “dumpster diving” provides access for a would-be thief to a victim’s personal information. Therefore, when disposing of paper documents, paperwork containing non-public personal information shall be shredded or otherwise destroyed.
- To avoid a fraudulent address change, requests must be verified before they are implemented, and confirmation notices of such address changes shall be sent to both the new address and the old address of record.
- Associated Persons may be deceived by pretext calling, whereby an “information broker” or “identity thief” posing as a client, provides portions of the client’s non-public personal information (i.e., Social Security number) in an attempt to convince an Associated Person to provide additional information over the phone, which can be used for fraudulent purposes. Associated Persons shall make every reasonable precaution to confirm the identity of the client on the phone before divulging non-public personal information.
- The Company prohibits the display of Social Security numbers on any documents that are generally available or widely disseminated (i.e., mailing lists, quarterly reports, etc.).
- Associated Persons could be responsible for identity theft through more direct means. Insider access to information could permit a dishonest Associated Person to sell consumers’ personal information or to use it for fraudulent purposes. Such action is cause for disciplinary action at the Company’s discretion, up to and including termination of employment as well as referral to the appropriate civil and/or criminal legal authorities.

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CONTACT INFORMATION

If you have any questions or comments about this Privacy Notice, the ways in which we collect and use your personal information, or your choices and rights regarding such use, please do not hesitate to contact us at:

WEBSITE: alphawavefintech.com

EMAIL: alphawavefintech@outlook.com

ADDRESS:

Alphawave Fintech

Attn: Compliance

1515 Franklin Drive

San Marcos, TX 78666

QUESTIONS: If you have any questions, please contact our Compliance Department at alphawavefintech@outlook.com

Effective December 1, 2024