

FACTS	WHAT DOES ANDESA FINANCIAL MANAGEMENT, INC. DO WITH YOUR FINANCIAL INFORMATION?
Why?	<p>Protecting Your Personal Information is Important</p> <p>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.</p> <p>This privacy notice (“Notice”) is provided by Andesa Financial Management, Inc. (referred to as “Andesa Financial Management,” “our,” “us,” or “we”). This Notice is addressed to any current clients or prospective clients (“you” or “your”) whose Personal Information Andesa Financial Management collects and controls to conduct its business.</p> <p>This Notice describes how we collect and use Personal Information (as defined below) about you during and after your working relationship with us. This Notice describes the basis upon which and for what purposes we process your Personal Information, as well as your privacy rights under certain privacy laws including, where applicable, under General Data Protection Regulation (“GDPR”) and applicable US privacy laws, and how we protect your Personal Information.</p> <p>We know that you are concerned with how we deal with your Personal Information. Maintaining your privacy is important to us and we hold ourselves to the highest standards in its safekeeping and use. We have developed policies designed to protect the confidentiality of your Personal Information, while allowing the needs of clients and investors to be served.</p>
What?	<p>Categories of Personal Information We Collect</p> <p>We collect Personal Information that may directly, or indirectly, identify you including non-public Personal Information as defined under applicable privacy laws (“Personal Information”). The types of Personal Information we collect, and share depends on the service you have with us. This information can include:</p> <ul style="list-style-type: none"> • personally identifying information such as name, social security number, telephone, address, date of birth, government identification, and marital status; • digital footprint data such as e-mail; • biographical data such as age and gender; • employment data such as national insurance number, salary information, job position, and tax information; • financial information such as bank information, income, account balances and assets, transaction history, pension, etc.

How?

How is your Personal Information Used?

All financial companies need to share customers' Personal Information to perform their services and run their everyday business. In the section below, we list the reasons financial companies can share their customers' Personal Information; the reasons we choose to share; and whether you can limit this sharing.

We will only use your Personal Information with the purpose to provide you with our wealth management services. In managing your investment for you, we will use your Personal Information to:

- monitor, audit, evaluate and otherwise continue to administer our services and conduct business processing functions including the provision of your Personal Information to our contractors, service providers or other third parties;
- communicate with you and respond to your inquiries;
- protect against, identify and prevent fraud, copyright infringement, unauthorized use and distribution of protected content and other unlawful activity, claims and liabilities;
- conduct investigations and comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies and terms; and/or
- for other purposes required or authorized by law, including other purposes for which you have provided your consent.

Where required by applicable law, we obtain consent to process Personal Information. In the event that we use Personal Information we collect for other purposes not identified above where direct client consent is required under applicable rules, laws and/or regulations we will provide specific notice at the time we collect such Personal Information.

Disclosure of your Personal Information to Third Parties

We do not disclose nonpublic Personal Information to nonaffiliated third parties (such as brokerage firms or insurance companies) except as permitted by law or in carrying out the duties for which you retained us. It is our policy to contact you prior to the release of any nonpublic private information to nonaffiliated third parties and to provide you with the option to opt out.

If we provide Personal Information to a third party with which we have a business relationship, we will have the third party execute a signed non-disclosure agreement and/or otherwise ensure that they will keep such information confidential, consistent with the conduct of our business relationship.

We do not provide your Personal Information to mailing list vendors or solicitors for any purpose. Disclosure of any nonpublic Personal Information about our former clients is handled in the same manner as for our current clients.

All financial companies need to share client's Personal Information to run their everyday business. In the section below pursuant to U.S. Federal Laws, we list the reasons financial companies can share their customers' Personal Information; the reasons we choose to share and whether you can limit this sharing.

Reasons we can share your Personal Information	Does Andesa Financial Management share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s) or respond to court orders and legal investigations	Yes	No
For our marketing purposes — to offer our products and services to you	Yes	Yes
For joint marketing with affiliates	No	We don't share
For joint marketing with non-affiliates	No	We don't share
For our affiliates' everyday business purposes — information about your transactions, accounts, etc.	No	We don't share
For our non-affiliates' everyday business purposes — information about your transactions, accounts, etc., as necessary	Yes, but only with your expressed consent	Yes
For our affiliates to market to you	No	We don't share
For our non-affiliates to market to you	No	We don't share

Who we are	
Who is providing this notice?	Andesa Financial Management 1011 Brookside Road, Suite 150 Allentown, PA 18106
What we do	
How does Andesa Financial Management protect my Personal Information?	<p>To protect your Personal Information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards (such as password protection or encryption) and restricting access to physical files (such as locked cabinets or building). We continually update and improve security standards and procedures to guard against anyone gaining unauthorized access to your Information, including through the Internet.</p> <p>We limit access to nonpublic Personal Information to only those employees who have a business or professional reason for knowing it and only to nonaffiliated third parties as permitted by law. We maintain physical, electronic and procedural safeguards to guard your Personal Information.</p>
How does Andesa Financial Management collect my Personal Information?	<p>We collect your Personal Information, for example, when you:</p> <ul style="list-style-type: none"> • Open an account • Deposit money • Seek advice about your investments • Enter into an investment advisory contract

	<ul style="list-style-type: none"> • Provide us with information about your investment or retirement portfolio or earnings
<p>Why can't I limit all sharing?</p>	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes; • affiliates from using your information to market to you; and • sharing for non-affiliates to market to you. <p>U.S. state laws and individual companies may give you additional rights to limit sharing.</p>
<p>What happens when I limit sharing for an account I hold jointly with someone else?</p>	<p>Your choices will apply to everyone on your account – unless you tell us otherwise.</p>
<p>Lawful Basis for Processing</p>	<p>We may have one or more of the following lawful bases to process your Personal Information:</p> <ul style="list-style-type: none"> • Consent: your freely, informed, and voluntary consent to process your Personal Information in connection to our wealth management services. • Contract: processing your Personal Information is necessary in order to fulfill a contract. • Legal Obligation: processing is necessary to comply with applicable rules, laws, and regulations. • Legitimate Interests: processing is necessary to the legitimate interests of our firm and/or a third party.
<p>Individual Rights</p>	<p>To the extent permitted by the applicable law of your jurisdiction, in relation to your Personal Information, you may request:</p> <ul style="list-style-type: none"> • to have your Personal Information corrected, for example, if it is incomplete or incorrect; • to opt out of receiving marketing communications at any time; • the right to file a complaint with an applicable government regulator such as a Data Protection Authority. <p>In addition to the foregoing, if you are located in the European Economic Area ("EEA"), to the extent permitted by applicable law, in relation to your Personal Information, you may request:</p> <ul style="list-style-type: none"> • to access the Personal Information held by us about you; • the right to restrict or object to the processing of your Personal Information, or request that your Personal Information is erased; • the right to receive a copy of the Personal Information which you have provided to the firm, in a structured, commonly used and machine-readable format (known as "data portability");

	<ul style="list-style-type: none"> • where you have provided Personal Information voluntarily, or otherwise consented to its use, the right to withdraw your consent. <p>To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to your Personal Information.</p> <p>To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your Personal Information that we maintain.</p>
<p>Will your Personal Information be kept Accurate, Complete and Up to Date?</p>	<p>We will endeavor to ensure your Personal Information is kept accurate, complete, up to date and relevant. Please let us know if any of your details change. If you feel your Personal Information is not accurate, complete or up to date, please notify us and we will take reasonable steps to ensure it is corrected. You can contact us using the details listed below.</p>
<p>Retention and Processing of Personal Information</p>	<p>To the extent permitted by applicable law, we retain your Personal Information for the period necessary to serve the purposes for which we obtained it. We may also retain your Personal Information beyond such period in accordance with applicable laws, regulations, or another lawful basis, including but not limited to, compliance with our contractual obligations, legal obligations, regulatory obligations, legal claims, or another legitimate interest.</p>
<p>Data Transfers</p>	<p>We may transfer the Personal Information we obtain about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. To the extent required by applicable law, when we transfer your information to recipients in other countries (such as the United States, United Kingdom, Ireland or Cayman Islands), we will protect that information as described in this Notice.</p> <p>If you are located in the European Economic Area ("EEA"), we will comply with applicable legal requirements regarding the provision of appropriate safeguards for the transfer of Personal Information to recipients in countries for which the European Commission has not issued an adequacy decision.</p>

Our Commitment

We want to assure you that we are committed to maintaining the confidentiality, integrity and security of your Personal Information. The safeguarding of client information is an issue we take seriously; whenever information is used, it is done with discretion.

We have developed these privacy policies to protect our clients. These policies are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreement we have with our clients.

We want our clients to understand our commitment to their privacy and our use of client information. If you have any further questions, please feel free to call us regarding this privacy policy, or if you would like to exercise your rights, you may contact our Chief Compliance Officer using the information below.

Data Controller	As identified under applicable law, the data controller for this Site is: Andesa Financial Management located at the address below.
Whom can you contact at Andesa Financial Management?	If you have any questions regarding this privacy policy or would like to exercise your rights, you may contact our Chief Compliance Officer using the information below: Attention: Paul Barbehenn, Chief Compliance Officer Andesa Financial Management 1011 Brookside Road, Suite 150 Allentown, PA 18106 Phone: (610) 841-5367 E-mail: paul.barbehenn@andesafm.com Web: www.andesafm.com

Definitions

Affiliates	Companies related by common ownership and/or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none">• We do not have any affiliate companies.
Non-affiliates	Companies not related by common ownership and/or control. They can be financial or nonfinancial companies. <ul style="list-style-type: none">• We do not share with nonaffiliates, so they can market to you.
Joint marketing	A formal agreement between non-affiliated financial companies that together market financial services to you. <ul style="list-style-type: none">• We do not jointly market.