

Protecting Your Personal Information is Important

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.

Like most industries today, the financial services industry continues to be shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to ensure that our clients are confident that we will manage their financial affairs expertly and confidentially.

This online privacy policy (“Privacy Policy”) is provided by Andesa Financial Management, Inc. referred to as (“Andesa Financial Management,” “our,” “us,” or “we”). This Privacy Policy 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, including on our website (“Site”).

This Privacy Policy describes how we collect and use Personal Information (as defined below) about you during and after your working relationship with us. This Privacy Policy 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.

To affirm our continued commitment to the proper use of client information and protecting your privacy, we have set forth the following privacy policies.

By visiting this Site, you are accepting the practices described in this Privacy Policy. If you do not agree to this policy, please do not use this Site.

What Type and Sources of Information We Collect

We collect certain personal information that may directly, or indirectly, identify you, including nonpublic personal identifying information (“Personal Information”) from information that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions.

Categories of Personal Information We Collect

The types of Personal Information we collect and share depends on the service we provide to you. This information can include:

- 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 purchases, sales, account balances, inquiries, bank information, income, account balances and assets, transaction history, pension, etc.

What Personal Information Do We Collect When You Visit our Site?

When you visit our Site, we may collect information from you if you send us an e-mail through our “Contact Us” form, which may include your basic contact information such as your name and e-mail address. We do not collect any other personal information on our Site.

How is your Personal Information Used?

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.

What Information We Disclose

All financial companies need to share client’s personal information to run their everyday business. We do not disclose the nonpublic personal information we collect about our clients to anyone except:

- in furtherance of our business relationship with them and then only to those persons necessary to affect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers etc.);
- to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.);
- our attorneys, accountants, and auditors;
- or as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative services on our behalf). These third parties are prohibited to use or share the information for any other purpose. If you decide at some point to either terminate our services or become an inactive client, we will continue to adhere to our privacy policy, as may be amended from time to time.

In the section below pursuant to U.S. Federal Laws, we list the reasons financial companies can share their customers' personal information; the reasons Andesa Financial Management chooses to share; and whether you can limit this sharing.

Reasons we can share your Personal Information	Does FIRM NAME 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

Limits on Sharing

To the extent U.S. Federal laws apply to your personal information, you have the right to limit only:

- sharing for affiliates' everyday business purposes;
- affiliates from using your information to market to you; and
- sharing for nonaffiliates to market to you.

U.S. state laws and individual companies may give you additional rights to limit sharing.

Lawful Basis for Processing

We may have one or more of the following lawful bases to process your personal information:

- **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.

Individual Rights

To the extent permitted by the applicable law of your jurisdiction, in relation to your personal information, you may request:

- 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.

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:

- 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 our firm, in a structured, commonly used and machine-readable format (known as "data portability");
- have a copy of the personal information we hold about you provided to you or another controller where technically feasible;
- where you have provided personal information voluntarily, or otherwise consented to its use, the right to withdraw your consent.

To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to your information.

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.

Will your Personal Information be Kept Accurate, Complete and Up to Date?

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.

Security of our Clients' Information

We continually update and improve security standards and procedures to guard against anyone gaining unauthorized access to your Information, including through the Internet.

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

As our Site is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

Links to Third-Party Websites. As a convenience to you, we may provide hyperlinks to websites operated by third parties. When you select these hyperlinks, you will be leaving our Site. We have no control over third party websites, their content, or security. Accordingly, when you access these third-party websites it is at your own risk. We encourage you to read the associated privacy policies by such third-party websites to learn more about their data privacy management practices. We may, in our sole discretion, block links to our Site and content without prior notice.

Retention of Personal Information

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.

Information about Children

The Site is not directed to children under the age of 18 years. By using this Site, you represent and warrant that you are at least 18 years old.

In accordance with the Children's Online Privacy Protection Act ("COPPA"), we do not

knowingly solicit or collect personal information on this Site from children under the age of 13 without prior verifiable parental consent.

Data Transfers

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 Online Privacy Policy.

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.

Do We Use "Cookies" or Obtain Personal Information by Automated Means?

We do use "cookies" on our Site.

Cookies are small text files that are stored in your computer's memory and hard drive when you visit certain web pages. They are used to enable websites to function or to provide information to the owners of a website. For example, cookies can be used to remember your preferences or count the number of website visitors.

For more information about cookies, please see the Appendix below.

Changes to our Privacy Policy or Relationship with our Clients

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change. Such changes shall be effective immediately upon posting. The current version of this privacy policy can be accessed from the link on the bottom of our homepage, or at the bottom of our other Site pages. By accessing our Site after we have posted changes to this privacy policy, you are agreeing to the terms of the privacy policy as modified.

Data Controller

As identified under applicable law, the data controller for this Site is 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
4905 Hamilton Boulevard
Allentown, PA 18106
Phone: (610) 841-5367
E-mail: paul.barbehenn@andesafm.com
Web: www.andesafm.com

Definitions

Affiliates: Companies related by common ownership or control. They can be financial and nonfinancial companies.

- We do not have any affiliate companies.

Nonaffiliates: Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- We do not share with non-affiliates, so they can market to you.

Joint Marketing: A formal agreement between nonaffiliated financial companies that together market financial services to you.

- We do not jointly market.

Appendix

Additional Information About Cookies

A website may use cookies for the following purposes:

- *Analytical purposes:* Analytical cookies allow a website to recognize, measure and track website visitors. This helps the website host improve and develop the way a website works, for example, by determining whether website visitors can find information easily, or by identifying the aspects of the site that are of the most interest to them.
- *Usage preferences:* Some of the cookies on a website are activated when visitors make a choice about their usage of the site. A website then 'remembers' the settings preferences of the user concerned. This allows the website host to tailor aspects of the site to the individual user.
- *Terms and conditions:* Some website cookies record when a website visitor has seen a policy, such as this one, or provided consent, such as consent to the terms and conditions on the website. This helps to improve the user's experience on the website – for example, it avoids a user from repeatedly being asked to consent to the same terms.

- *Session management*: The software that runs a website may also use cookies for technical purposes needed by the internal workings of a website’s servers. For instance, some websites use cookies to distribute requests among multiple servers, authenticate users and determine what features of the site they can access, verify the origin of requests, keep track of information about a user's session and determine which options or pages to display in order for the site to function.
- *Functional purposes*: Functional purpose cookies store information that is needed by certain web applications to process and operate. For example, where transactions or requests within an application involve multiple workflow stages, cookies are used to store the information from each stage temporarily, in order to facilitate completion of the overall transaction or request.

Third party cookies. When you visit our Site, you may receive cookies that are set by third parties. These cookies are used for the purposes described in the bullet points above. We do not control the setting of these third-party cookies, so we suggest you might wish to check the third-party websites for more information about their use of cookies and how to manage them.

Withdrawing your Consent/Amending Internet Browser Settings to Disable Cookies. You may withdraw your consent from a website that tracks cookies at any time by adjusting your internet browser settings to delete all cookies. If you do this, however, you may have to manually adjust some your internet browser preferences every time you visit a site and some services and functionalities may not work. Specifically, you can use your web browser to:

- delete all cookies;
- block all cookies;
- allow all cookies;
- block third-party cookies;
- clear all cookies when you close the browser;
- open a 'private browsing' / 'incognito' session, which allows you to browse the internet without storing local data; and
- install add-ons and plug-ins to extend browser functionality.

For more information about cookies and how to disable them please visit www.aboutcookies.org or www.allaboutcookies.org, or you may consult the vendor documentation for your specific software.

How do We Respond to Do Not Track Signals?

We do not track users across time or over multiple websites and, we do not receive, or respond to, browser do-not-track signals or other similar mechanisms. However, as noted above, some third-party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you.

Amending your internet browser’s Do Not Track signal: Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers and is a way for users to inform websites

and services that they do not want certain information about their webpage visits collected over time and across Websites or online services.

To learn more about setting up a Do Not Track signal, please visit <https://allaboutdnt.com/>.