

Your Privacy Matters

Welcome to Wealthia, This App is owned and operated by Luxant Limited. Protecting your privacy is important to us. We take precautions to ensure that your information is kept private and confidential. To assist us in providing you the quality services and products that you request or to help meet your needs, we gather, maintain, and use both public and nonpublic personal information about you. We are providing you with the following policies and practices with respect to sharing of customer information.

COMMITMENT TO YOUR PRIVACY

Wealthia believes that the trust of our Partners and Clients are our greatest asset. That is why we are committed to protecting your privacy and the confidentiality of your personal information. We are providing this Privacy Policy to you in an effort to explain our collection, use, retention and security of your personal information.

HOW WE GATHER INFORMATION

We collect your personal information in the process of establishing and administering your accounts.

1. Application information. When you create a profile on the Wealthia App, you provide information to us on your account application. This information may include your name, address, phone number, email address, and information about your investment experience, objectives, current investments, and information we may obtain from third-parties.

2. Transaction information. Any time you initiate a transaction through us, we collect information about that transaction.

HOW WE USE AND SHARE INFORMATION

We share your personal information only for our everyday business purposes – such as to process your requests, maintain your account(s), respond to court orders and legal investigations– and it is limited to those parties who assist us in establishing and administering your account. We do not sell your personal information to anyone.

1. Use of information. We use your personal information to establish and administer your accounts, to alert you to services we provide, and to fulfill our regulatory obligations.

2. Sharing information for the purpose of providing service. We disclose your personal information to our partners who may want to reach out to you.

3. Sharing information for legal purposes. In certain circumstances, we may share personal information as required or permitted by law. We may do so, for example, to cooperate with regulators or law enforcement authorities, to resolve consumer disputes, or for institutional risk control.

HOW WE PROTECT INFORMATION

Even when we share your personal information, we remain committed to maintaining your privacy. We take steps to protect confidentiality of personal information whenever possible.

1. Contractual protections. We have contracts with all of our employees and with unaffiliated companies with whom we share personal information, prohibiting them from using such personal information for any purpose other than that for which it is disclosed, and further prohibiting them from disclosing it to any other parties.

2. Sharing with affiliates. We do not share personal information with affiliates unless it is necessary to service your accounts or as permitted by law.

3. Physical and procedural safeguards. We maintain physical, electronic, and procedural safeguards to protect the confidentiality of your personal information. We also restrict employee access to your personal information to those employees who need to know that information in the course of their job responsibilities.

PRIVACY ONLINE

We consider privacy, security, and service in our online operations to be just as critical as in the rest of our business. We therefore employ all of the safeguards described above, along with the following Internet-specific practices.

We use a variety of proven protections to maintain the security of your online session. For example, we make extensive use of firewall barriers, encryption techniques and authentication procedures. We may also use “cookies” and similar files that may be placed on your computer’s hard drive for security purposes, to facilitate App navigation, and to personalize your experience on our App.

When you visit our App, we may collect technical and navigational information, such as computer browser type, Internet protocol address, pages, and average time spent on our App. This information may be used, for example, to alert you to software compatibility issues; or it may be analyzed to improve our web design and functionality.

When you visit password-protected areas of our App, we will require you to enter your individual login ID and password. In such cases, your browsing will no longer be anonymous to us. However, we will use your personal information only to provide you with account information or otherwise as listed above.

While we take active steps to protect all information we receive online, we cannot guarantee the security of any information you transmit to us via the Internet. Emails you send us are not necessarily secure when they are transmitted to us. Therefore, if your communication is very sensitive or includes highly confidential information such as a social security number or an account number, it may be prudent for you to use a method of transmission other than email or otherwise encrypt such information.

Other Information We reserve the right to change this Privacy Policy and any of the policies and procedures listed herein at any time. However, if at any time in the future it becomes necessary to disclose personal information in a

way that is inconsistent with this Privacy Policy, we will give you advance notice of the proposed change and an opportunity to opt out of such disclosure. If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

This Privacy Policy applies to services provided by Wealthia App . Third parties who provide you with financial services may have policies that differ from this one. You should contact those companies directly for more information. The examples and illustrations contained in this Privacy Policy are illustrations and are not intended to be exclusive.

If you have any questions or concerns regarding this Privacy Policy, please send a mail to

In this Privacy Policy, the words “you” and “customer” are used to indicate any individual who obtains or has obtained a financial product or service from Wealthia App that is to be used primarily for personal, family, or household purposes. The words “personal information” are used to indicate any nonpublic information that identifies you or your accounts.

UPDATE YOUR INFORMATION

Should you have significant life changes, such as a marriage, birth of a child, change of contact information, death of a spouse, divorce, or a significant change in your financial situation, please contact your Wealth Advisor to determine if such changes will alter your investment objectives, risk tolerance, or investment horizon.

CODE OF ETHICS

Luxant Limited Wealth Management maintains a Code of Ethics governing its relationship with investors. If you would like a free copy of our Code of Ethics or would like to discuss a complaint, please send mail to.....

BUSINESS CONTINUITY PLAN

Wealthia App has developed a Business Continuity Plan (the “Plan”) designed to prevent or mitigate potential business disruption. Since the timing and severity of events that can lead to business disruption are unpredictable, our Plan is comprehensive, continually evolving, and practiced on an ongoing basis.

Our Plan is designed to safeguard our employees and property, protect the firm’s books and records, allow our advisors and clients to transact business, and communicate effectively with all stakeholders. Our Plan is also designed to ensure business is not disrupted and to permit our firm to resume business as quickly as possible if there is a disruption.

Our Plan addresses data back-up and recovery, critical technology and communications systems, financial and operational assessments, alternative communications with advisors, clients, employees and regulators, alternate physical locations for employees, critical suppliers and contractors, regulatory reporting, and ensuring prompt access to information if there is a business disruption.

The objective is to have critical functions operational within one hour. However, in severe or widespread situations, operations could be delayed for a longer period of time. In the event of a disruption, we will notify you through regular communications on our App or via email, if appropriate.

FOR MORE INFORMATION

If you have questions about our Plan, please send a mail to

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