Robinson Smith Wealth Advisors, LLC
2026 Privacy Policy Notice

Rev. [March, 2026]

FACTS	WHAT DOES ROBINSON SMITH WEALTH ADVISORS, LLC DO WITH YOUR FINANCIAL INFORMATION?
Why?	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.
What?	The types of personal information we collect and share depends on the product or service you have with us. This information can include: ▪ Social Security number and income ▪ Account balances and assets ▪ Transaction history
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Robinson Smith Wealth Advisors, LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Robinson Smith Wealth Advisors, LLC share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	Not Applicable
For our affiliates' everyday business purposes – information about your transactions and experiences	No	Not Applicable
For our affiliates' everyday business purposes – information about your creditworthiness	No	Not Applicable
For our affiliates to market to you	No	Not Applicable
For nonaffiliates to market to you	No	Not Applicable

Questions?	Call (207) 874-9840 or go to www.robinsonsmithwealth.com

Who we are	
Who is providing this notice?	Robinson Smith Wealth Advisors, LLC

What we do	
How does Robinson Smith Wealth Advisors, LLC protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards as well as secured files and a secure building.
How does Robinson Smith Wealth Advisors, LLC collect my personal information?	We collect your personal information, for example, when you: ▪ Open an account ▪ Deposit money ▪ Seek advice about your investments ▪ Enter into an investment advisory contract ▪ Tell us about your investment or retirement portfolio or earnings We also collect your personal information from other companies.

Definitions	
Affiliates	Companies related by common ownership and control. They can be financial and nonfinancial companies. ▪ *We have no affiliates.*
Nonaffiliates	Companies not related by common ownership and control. They can be financial or nonfinancial companies. ▪ *We do not share with nonaffiliates so that they can market to you.*
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or service to you. ▪ *We do not jointly market.*

1. Purpose

This Policy outlines the way in which RSWA will use the private information that is shared by investors with RSWA and the safeguards in place to protect such private information from unauthorized dissemination.

2. Policy Statement

As a matter of policy, RSWA seeks to protect the "nonpublic personal information" of natural person consumers and customers. Nonpublic personal information includes nonpublic "personally identifiable financial information" plus any list, description or grouping of customers that is derived from nonpublic personally identifiable financial information.

This Policy explains the types of information that RSWA collects from its investors, how it uses and discloses that information and the measures in which RSWA takes to safeguard that information.

3. Scope

This policy governs all private information shared by investors in the course of their interactions with RSWA.

4. Review Period

RSWA will conduct a review of this Policy at least once per year or when significant business process changes occur, to ensure that the information contained herein is still current and applicable.

5. Policy Requirements

a. Private information shared by Investors with RSWA

In order to comply with anti-money laundering and anti-terrorist activity laws, as well as to comply with Know Your Client (KYC) guidelines, RSWA gathers private information on and from investors including (but not limited to):

- Personal mailing and contact information;
- Scanned copies of IDs and utility invoices;
- Tax ID numbers;
- Information on personal wealth and source of wealth accumulation;
- Corporate incorporation documents;
- Completed tax forms;
- Individual capital account reports on the performance of investors in funds managed by RSWA;
- Legal agreements; and
- Minutes from investor meetings

b. Using and disclosing private information shared by Investors with RSWA

RSWA saves private information on secure cloud-based servers (please refer to RSWA's IT Policy) and temporarily uses hard copies of certain private investor information disclosed in subscription forms, KYC documents and other legal agreements. These hard copies are shredded after they are no longer needed. RSWA regularly discloses certain private information to fund administrators and auditors in compliance with local regulations. This typically involves the names of investors and perhaps the domicile of these investors.

As a Registered Investment Advisor under the Securities and Exchange Commission (SEC)'s supervision, RSWA may be audited and may be required to disclose personal tax information or other private information it has on individual investors as required by law. RSWA provides each Client with all such privacy notices as may be required by law or any rule or regulation."

In addition, RSWA discloses private information for the following reasons:

- To comply with a court order, legal process or other judicial or investigative proceeding that produces a request for information;
- To permit auditing of account information;
- To fulfill or respond to a request from the investor or their authorized representative; and
- To sell or transfer RSWA's business or assets.

c. Safeguarding Private Information shared by Investors with RSWA

All RSWA employees are bound by codes of professional conduct to protect the confidentiality of investor information, and to prevent unauthorized use, access to or disclosure of investor information. The use of and access to investor information is restricted to those employees who need to know that information in order to provide services to investors.

Any employee who is authorized to have access to nonpublic personal information is required to keep such information in a secure compartment or receptacle on a daily basis as of the close of business each day. All electronic or computer files containing such information shall be secured and protected from access by unauthorized persons. Any conversations involving nonpublic personal information, if appropriate at all, must be conducted by employees in private, and care must be taken to avoid any unauthorized persons overhearing or intercepting such conversations.

All soft copies of documents shared with investors containing their social security numbers will be password protected or made accessible through a password protected site in accordance with U.S privacy laws.

d. Enforcement, Privacy and Consequences of Policy Violation

Employees are responsible for reporting all suspected infractions of this Policy to the Chief Compliance Officer.

When it suspects a Policy violation, RSWA shall further investigate the matter and is permitted to ask for employee's personal financial records. RSWA expects full cooperation from all staff in its investigation.

When it finds a Policy violation, RSWA will exercise its rights to take appropriate disciplinary action including, but not limited to,

- Verbal/written warnings;
- Disciplinary action and/or termination of employment for employees; and
- RSWA may report suspected violations to law enforcement when appropriate and will cooperate with all local, national, and international law enforcement agencies. RSWA is not responsible for sanctions taken by these agencies for violations of this Policy that are against local and international laws and/or criminal codes.

Any disclosure of information in a document that has been completed and submitted by you to RSWA to facilitate a business relationship between you and a third-party provider (i.e., banker, account custodian, insurance company, etc.) will automatically be considered as having been authorized by you with respect to the non-affiliated third-party service provider.

Each individual or party affiliated with RSWA is aware of this Privacy Policy and has agreed to comply with it. Members of the firm have access to the nonpublic personal information of our clients to the extent that it is necessary for them to perform their responsibilities owed to RSWA. RSWA maintains physical, electronic, and procedural safeguards to guard your information.

As required by federal law, RSWA will provide notice to its customers of its Privacy Policy annually. RSWA reserves the right to modify this policy at any time, but in the event that there is a change, RSWA will promptly inform its customers of that change.