<u>PRIVACY POLICY</u>

Effective Date: December 2024

At Avalon Financial ("AF"), we understand confidentiality is key in any financial relationship. We recognize that client's personal identifying and financial information ("PFI") is private, and we are committed to keeping it secure and confidential.

Federal law gives consumers the right to limit some but not all sharing of private information. Federal law also requires AF tell our clients how we collect, share, and protect PFI. A copy of our Privacy Policy will be delivered to clients when signing our Advisory Agreement.

AF will not collect any PFI without our client's knowledge. The PFI we collect includes, but is not limited to the following:

1. Name
2. Address
3. Phone Number
4. Email Address
5. Investment Experience
6. Risk Tolerance
7. Income and Expenses
8. Assets and Liabilities

Sharing PFI

The completion of certain business operations requires the collection and sharing of client PFI. All financial companies share customers' PFI to run their everyday business. For this reason, clients may not limit sharing of PFI for the everyday business purposes of AF, such as would be required to process client transactions, maintain client account(s), respond to court orders and legal investigations, report to credit bureaus, or for our communication with clients.

Federal law gives our clients the right to limit the sharing of certain PFI. However, AF does not share any client PFI with any affiliated or non-affiliated business, other than that allowed by law and listed above. Client PFI is never sold by AF to any third-party.

AF never discloses the identity or the financial matters of its clients *unless client first provides written permission* to do so, or if the firm is forced to turn over that info by court order or subpoena. As part of our Investment Advisory Agreement, clients agree to allow us to speak with client attorneys or tax accountants concerning their financial matters.

Limiting or Opting out of the sharing of client PFI

Under federal law, clients may limit the sharing of PFI with an affiliate that involves the clients' creditworthiness. Clients can also limit PFI shared to both affiliate and non-affiliates for marketing purposes, but may not limit sharing of info for AF's marketing purposes, joint marketing with other financial companies, and for our everyday business purposes. Since we do not share any client PFI, there is no opportunity to opt out of sharing.

Protections in Place
To protect client PFI from unauthorized access and use, security measures have been implemented which comply with federal law. These measures are listed in our Security Policy.

Changes to this policy
Future changes may be made to AF's Privacy Policy. AF will promptly notify clients when AF's privacy policies are updated by providing clients with a copy of the updated Privacy Policy and will deliver notices of AF's Privacy Policy during client's annual review.

CCO is required to promptly review and amend the Privacy Policy whenever material changes require such policies to be updated.