



Privacy Policy

March 2026

At Westfuller Advisors, LLC (“Westfuller”), protecting your privacy and safeguarding your personal information is very important to us. We have always valued the trust our Clients have placed in us and are committed to the confidentiality and protection of our Clients’ personal information. Please take a moment to review our Privacy Policy, as described below.

Gathering Information

We treat the information we gather about you in a confidential manner. Westfuller collects information about you to help us serve your financial needs, administer, and update accounts, reduce fraud and other risks, provide customer service, offer new products or services, and fulfill legal and regulatory requirements. Any collection of personal information is to support our normal business operations and service your account.

In order to service your account, Westfuller may collect nonpublic, personal information from you as well as from other sources. The sources and the information collected may include:

1. Information you provide to us or to our affiliated entities such as address, Social Security number, birth date, email address, net worth, assets, and income.
2. Information regarding your transactions with us, our affiliates, or others, such as products or services purchased, account balances, trading history, and payment history, as well as information from information service companies and consumer reporting agencies, such as your transactions or credit relationships with unaffiliated third parties.
3. Information from other unaffiliated third parties including employers, associations, benefit plan sponsors, and other institutions or non-financial services providers, such as mutual fund companies, investment firms, third party administrators, clearing firms, and other third parties who assist in providing account maintenance or Client service to the Client account(s).

Sharing Information

We may disclose any of the nonpublic, personal information that we collect about you as required to conduct our business. The firm reserves the right to disclose or report personal information in limited circumstances where the firm believes in good faith that disclosure is required under law, to cooperate with regulators or law enforcement authorities, to perform necessary credit checks or collect or report debts owed to the firm, or to protect the firm’s rights or property. We may share information about our Clients with our affiliates, unaffiliated financial or non-financial services providers, such as mutual fund companies, investment firms, any Westfuller affiliated company, third party administrators, clearing firms, and other third parties who assist in providing account maintenance or Client service to your account(s). We also may share your information with regulators and law enforcement organizations, or in response to a subpoena or discovery request, as permitted or required by law. We do not sell your nonpublic, personal information identified above; however, we may share or disclose this information to companies for marketing purposes. You have the right to “opt out” of such disclosure, as described at the bottom of this Privacy Policy. All companies with whom we share information are contractually obligated to comply with strict standards regarding security and confidentiality, and the information provided can be used only for the sole purpose of providing the service(s) we have requested the company to perform or would be expected to be performed based upon such third party’s lines of business.

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.



Safeguarding Privacy

Westfuller recognizes the need to prevent unauthorized access to the information we collect, including information held in electronic format. Westfuller authorizes access to your nonpublic, personal information only to personnel who require that information to serve you. We maintain physical, electronic, and procedural safeguards to guard your nonpublic, personal information to ensure that we comply with our own policy, industry practices, and federal and state regulations. Should you decide to terminate your relationship with us, you can be assured that your information will continue to be treated according to the policies and practices as described in this privacy notice.

Opting Out

If you do not want Westfuller to share your information as described above, you have the right to opt-out of such disclosure. If you wish to opt-out, now or at any time in the future, please contact Westfuller at 212-219-6198. You may also contact us by mail at Westfuller Advisors, 1185 Avenue of the Americas, Suite 319, New York, NY 10036.

Policy Changes

For current investors, we will provide you with a copy of this Privacy Notice annually. For prospective investors, we encourage you to periodically review this Privacy Notice to ensure you are familiar with the most current version.

Supplemental Data Privacy Notice for Residents of California and Oregon

To the extent provided for by law and subject to applicable exceptions and exemptions, residents of California and Oregon have the following rights in relation to the personal information we collect:

1. The right to know what personal information we have collected and how we have used and disclosed that personal information;
2. The right to request deletion of your personal information;
3. The right to request the correction of inaccurate personal information.
4. The right to opt out of the sale of your personal information (Westfuller does not sell your personal information); and
5. The right to be free from discrimination relating to the exercise of any of your privacy rights.

Exercising Your Rights: Residents of California and Oregon can exercise the above privacy rights by contacting Westfuller at 212-219-6198. You may also contact us by mail at Westfuller Advisors, 1185 Avenue of the Americas, Suite 319, New York, NY 10036.

In order to protect your personal information from unauthorized access or deletion, we may ask you to provide additional personal information for verification. If we cannot verify your identity, we will not delete your personal information.

You may submit a request to know or a request to delete your personal information through an authorized agent. If you do so, the agent must present signed written permission to act on your behalf and you may also be required to independently verify your identity with us.

Contact Information

If you wish to contact us or have any questions about or complaints in relation to this Privacy Notice, please contact Westfuller at 212-219-6198. You may also contact us by mail at Westfuller Advisors, 1185 Avenue of the Americas, Suite 319, New York, NY 10036.