

## PRIVACY NOTICE

### WHAT DOES DAVIVIENDA ADVISORS DO WITH YOUR PERSONAL 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 depend on the product or service you have with us. This information can include: ☞ Social Security or taxpayer identification numbers ☞ Home address or email address ☞ Assets, income and other financial information When you are no longer our customer, we may continue sharing your information as described in this notice.
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 Davivienda Investment Advisor USA LLC ("Davivienda Advisors") chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Davivienda Advisors share?	Can you limit this sharing?
<b>For our everyday business purposes</b> — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> — to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We do not share
<b>For our affiliates' everyday business purposes</b> — information about your transactions and experiences	Yes	Yes
<b>For our affiliates' everyday business purposes</b> — information about creditworthiness	No	We do not share
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For non-affiliates to market to you</b>	No	We do not share

<b>To limit our sharing</b>	<p>- Call (786) 238 7925 or            - Send us an Email: <a href="mailto:support@daviviendaadvisors.com">support@daviviendaadvisors.com</a></p> <p>Please note:            If you are a new customer, we can share your information 30 days from the date we sent the notice. When you are no longer our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
<b>Questions?</b>	Call (786) 238 7925 or send us an Email at <a href="mailto:support@daviviendaadvisors.com">support@daviviendaadvisors.com</a>

<b>Who we are</b>	
Who is providing this notice?	Davivienda Investment Advisor LLC 1110 Brickell Avenue, Suite 900B. Miami Florida 33131

<b>What we do</b>	
How does Davivienda Advisors 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 and secured files and buildings.
How does Davivienda Advisors collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> <li>☞ open an account or</li> <li>☞ deposit or withdraw money</li> </ul> <p>We also collect your personal information from other sources, such as affiliates.</p>
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>☞ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>☞ affiliates from using your information to market to you</li> <li>☞ sharing for non-affiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>

<b>Definitions</b>	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. Our affiliates include: <ul style="list-style-type: none"> <li>• Davivienda Corredores S.A.</li> <li>• Banco Davivienda S.A.</li> <li>• Fiduciaria Davivienda S.A.</li> <li>• Other companies within the corporate group of Grupo Bolívar S.A.</li> </ul>
Non-affiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. In connection with our model portfolio discretionary investment advisory services, we currently share information with BCP Advisors LLC d/b/a BCP Global, as subadviser, and with Interactive Brokers LLC, as custodian.
Joint marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you.

<b>Other important information</b>
Our relationship with you is one of our most vital assets. We recognize that you have entrusted us with your private financial information, and we will do our utmost to maintain this trust. From time to time, we may amend our privacy policy. You will receive appropriate notice when our privacy policy changes.