

PRIVACY POLICY

As a registered Investment Adviser, Financeware, Inc., d/b/a Wealthcare Capital Management (“Advisor”) has adopted policies and procedures to protect the nonpublic personal information of its natural person clients and customers, defined as including any nonpublic personally identifiable financial information and any list, description or grouping of customers derived from such information. Nonpublic personally identifiable financial information is defined as including personal financial and account information, information relating to services performed for or transactions entered into on behalf of clients, advice provided by Advisor, and data and analyses derived from such information.

Advisor does not share any nonpublic personal information with any nonaffiliated third parties, except in the following circumstances: (a) as necessary to provide the service the client has requested or authorized, or to maintain and service the client’s account; (b) as required by regulatory authorities or law enforcement officials having jurisdiction over Advisor, or as otherwise required by applicable law; and (c) to the extent reasonably necessary to prevent fraud and unauthorized transactions.

Advisor restricts access to nonpublic personal information to those employees who need to know such information to provide services to its clients. Employees of Advisor are permitted to disclose nonpublic personal information only to such other employees who need to have access to such information to deliver our services to the client. Employees of Advisor are prohibited from disclosing nonpublic personal information to any person or entity outside Advisor, during or subsequent to their employment with Advisor.

Notice of the Advisor privacy policy is provided to each client at the inception of the relationship and at least annually thereafter. Each client will receive notice of any material change to the privacy policy.