Worthen Financial Advisors, Inc.

104 Melody Lane, Friendswood, Texas 77546

PRIVACY POLICY NOTICE

Worthen Financial Advisors, Inc. ("we" or "our") respects your right to privacy and recognizes our responsibility for protecting the privacy and security of the personal information we receive from you. We have always been committed to securing the confidentiality and integrity of your personal information. We are proud of our privacy practices and want our current and prospective customers to understand what information we collect and how we use it.

Why We Collect Your Information

We gather and keep only information about you that is necessary for us to provide the services requested by you, administer your business with us, design and improve the services we offer and comply with the laws and regulations that govern us.

What Information We Collect

We may collect the following types of 'nonpublic personal information' about you:

- Personally Identifiable Information (PII).
  - Information about your identity, such as your name, address, and social security number.
  - Information about your transactions; and
  - Information about your personal financial profile, such as your risk tolerance levels, goals and objectives, assets, liabilities, savings, and investments.
- Non-Personally Identifiable Information (Non-PII).
  - Browser type, device ID, and IP address.

How We Use Your Information

We may use your information to:

- Verify investor eligibility.
- Facilitate transactions and fulfill service requests.
- Respond to inquiries and customer service requests.
- Deliver communications and regulatory updates.
- Maintain regulatory records.
- Improve site experience and compliance.
- Provide good faith disclosures to regulators who have regulatory authority over us.

What Sources We Obtain Your Information From

We collect nonpublic personal information about our clients, such as you, from the following sources:

- Information we receive from you on contracts or other forms, such as risk tolerance questionnaires and/or investment policy statements.
- Information about your transactions with our affiliates, or others.
- If you visit our website, we collect information via a web server (often referred to as a "cookie"). Cookies indicate where a site visitor has been online and what has been viewed.

What Information We Disclose

We only share your non-public personal information with your representative within our firm, affiliates, and non-affiliated companies or individuals as permitted by law, such as mutual funds, insurance companies, and other product vendors, or to comply with legal or regulatory requirements. With your approval, we may also share information with your advisors, which can include your accountant and/or attorney. We may engage third-party technology providers, including providers of AI-assisted meeting transcription and note-taking services, to assist in documenting client communications, maintaining records, supporting compliance functions, and improving servicing efficiency. These providers are contractually obligated to maintain the confidentiality and security of your information and may use your information only to provide services on our behalf. Additionally, in the normal course of our business, we may disclose information we collect about you to companies or individuals that contract with us to perform service functions such as:

- Record keeping.
- Computer-related services.
- Secure communication or meeting technologies.
- Good faith disclosure to regulators who have regulatory authority over the company.

Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested. Notwithstanding the above, we will not release information about our customers or former customers unless we receive your prior written consent, we believe the recipient to be you or your authorized representative, or we are required by law to release information to the recipient.

We do not sell your personal information to anyone.

Regulation S-P Procedures
Information Security and Incident Response. We maintain written policies and procedures designed to protect the security and confidentiality of nonpublic personal information. Our program includes measures to:

- Identify and assess risks of unauthorized access or use.
- Implement and monitor safeguards appropriate to our business model.
- Detect, respond to, and recover from security incidents affecting customer information.

If we determine that nonpublic personal information has been, or is reasonably likely to have been, accessed or used without authorization, we will notify affected individuals as soon as practicable, and no later than 30 days after that determination, except where a delay is requested by law enforcement.

Service Provider Oversight. We require third-party service providers with access to nonpublic personal information to:

- Maintain appropriate protections.
- Notify us promptly of any unauthorized access or use.
- Cooperate in incident response and mitigation efforts.

Additionally, we conduct ongoing due diligence and monitoring of service providers consistent with regulatory requirements.

Scope of Individuals Covered. These protections apply to current and former clients, as well as to individuals who provide information to us in connection with a potential advisory or brokerage relationship, even if no account is opened or no contract is signed.

Privacy Notice Delivery under Regulation SP. We will provide initial privacy notices consistent with Regulation S-P. Consumers will receive notice before any non-public personal information is shared with third parties, and customers will receive notice before a customer relationship is established. When a relationship is initiated by telephone and providing notice beforehand materially delays a transaction, the notice may be delivered within the Customer Agreement Form, provided you consent. Annual privacy notices will be provided to all active customer accounts unless the privacy policy remains unchanged.

Confidentiality and Security
We maintain physical, electronic, and procedural safeguards to guard your personal information. We also restrict access to your personal and financial data only to our authorized associates who need these records. Furthermore, we will continue to adhere to the privacy policies and practices described in this notice even after your account is closed or becomes inactive.

Cookies and Other Tracking Technologies
We may track users by IP address, by cookies (e.g., pieces of code or text placed on your computer by us or third parties when you browse our websites), by web beacons and other data collection methods for broad demographic data, as well as to help make sure that we are delivering the information you want. Our website sends cookies to your web browser (if your browser's preferences allow it) to collect data when you browse our website(s). Cookie settings can be controlled in your Internet browser to automatically reject some forms of cookies. If you view our website without changing your cookie settings, you are indicating your consent to receive all cookies from our website(s). If you do not allow cookies, some features and functionality of our website(s) may not operate as expected. In addition to cookies, we place technological tools (and allow certain third parties to place technological tools) such as tags and beacons (e.g., code scripts that are primarily used to track visitors' activities on our website(s) by web analytics software), Internet Protocol (IP) addresses, and other tools, to collect your data for the purposes listed in this Privacy Policy. "Do Not Track" signals are options available on your browser to tell operators of websites that you do not wish to have your online activity tracked. Our websites operate no differently if these "Do Not Track" signals are enabled or disabled.

SMS Privacy Policy
When you provide your mobile phone number to us, we collect and use that number solely for the purpose of sending you text messages that you have consented to receive. These messages may include account updates, appointment reminders, service notifications, support communications, and, when permitted, promotional information. We do not sell, lease, or otherwise share your mobile number or SMS activity with third parties for their own marketing purposes. Your number may be shared only with our trusted service providers who assist us in delivering text messages, and they are required to protect your information and use it only for the services we request. We maintain administrative, technical, and physical safeguards designed to protect your mobile number and any information transmitted via SMS from unauthorized access or disclosure. However, because SMS is not a fully secure communication channel, we encourage you not to send sensitive or confidential information by text message. By providing your number, you represent that it is your own, that you are authorized to use it, and that you understand message and data rates may apply.

You may opt out of receiving SMS messages at any time by replying "STOP" to any message we send. Once you opt out, we will cease SMS communications except where required for security or transactional reasons. You may request assistance at any time by contacting us at (832) 895-1188.

Opt-Out Provisions
We have taken steps to assure that all third-party vendors have confidentiality clauses to protect your information. Should we not have such written agreements in place, then you have the option to "opt-out" of the sharing of this information. If you desire to opt-out for those instances that we do not have the confidentiality clause, or you do not wish to receive marketing materials from us, you should provide us with written instructions forwarded to Chief Compliance Officer at the address set out above. Additionally, the law allows you to "opt out" of only certain kinds of information sharing with third parties. We do not share personal information about you with any third parties that trigger this opt-out right. This means you are already opted out of these sharing situations.

To Contact Us
If you have questions regarding our privacy policy, please contact us at (832) 895-1188.