PRIVACY POLICY

IWM Advisory, LLC | Innovative Wealth Management

EFFECTIVE October 27, 2026

IWM Advisory, LLC, doing business as Innovative Wealth Management ("IWM," "we," "us"), is an investment adviser registered with the State of Connecticut. We respect the privacy of our clients and former clients, and of everyone who visits our website. This policy explains what information we collect, how we use and protect it, and the limited circumstances in which we share it.

INFORMATION WE COLLECT

We collect nonpublic personal information that you provide to us in agreements, questionnaires, forms and conversations, such as your name, address, phone number, email address, date of birth, Social Security number, financial circumstances, investment objectives and risk tolerance. We also receive information about your accounts, holdings and transactions from your custodian (such as Altruist or Charles Schwab) and from other sources you authorize.

HOW WE USE AND SHARE INFORMATION

We use your information to provide investment advisory services to you, to manage and service your accounts, to communicate with you, to comply with legal and regulatory requirements, and to tell you about our own services.

We share your information only:

- with your custodian and the service providers that help us run our business (for example, technology, record-keeping and messaging providers), who may use it only to perform services for us and must keep it confidential;
- when you ask or authorize us to, verbally or in writing — for example, with your attorney, accountant or an insurance company when you ask us to help you with a recommendation; and
- when the law requires or permits it, such as in response to a regulator's examination or a court order.

We do not sell your information. We do not share it with anyone — including any affiliated company — for that company's marketing. We do not give your contact information to anyone without your verbal or written consent.

Because we share information only in these ways, you do not need to take any action to limit our sharing, and federal law does not give you a right to opt out of it. If we ever change our practices in a way that would give you that right, we will send you an updated notice before the change takes effect.

HOW WE PROTECT INFORMATION

We limit access to your information to the people and service providers who need it to serve you. We maintain administrative, physical and technical safeguards designed to protect it, including encryption, multi-factor authentication and access controls. No safeguard can eliminate every risk, but we review ours regularly.

If your personal information is ever affected by a security breach, we will notify you, and the authorities, as Connecticut law requires.

SOCIAL SECURITY NUMBERS

In keeping with Connecticut law, we protect the confidentiality of Social Security numbers, prohibit their unlawful disclosure and limit access to them to personnel and service providers who need them to open and service your accounts or meet tax and regulatory reporting obligations. We do not display Social Security numbers in communications or documents except where the law requires it.

FORMER CLIENTS

When our advisory relationship ends, we continue to protect your information as described in this policy. We retain records for the periods securities regulations require.

TEXT MESSAGING

If you give us your mobile number and agree to receive text messages, your financial adviser may text you about your accounts, appointments, paperwork and service requests. We do not send marketing texts.

- Message frequency varies. Message and data rates may apply.
- Reply STOP at any time to stop receiving texts. Reply HELP for help, or call (203) 693-1172.
- Agreeing to receive texts is not a condition of becoming or remaining a client.
- Mobile numbers and text-messaging consent are never shared with any third party or affiliate for marketing purposes. We share them only with the provider that delivers our messages, and only for that purpose.

- As required for investment advisers, we keep a record of text messages sent to and from our advisers.

Please do not send account numbers, Social Security numbers or passwords by text message or ordinary email. Call us and we will arrange a secure way to send them.

OUR WEBSITE

When you visit iwmadvisory.com, we and our service providers automatically collect limited technical information, such as your browser type, the pages you view and how you reached our site. We use Google Analytics, which relies on cookies, to understand how our website is used; you can opt out using Google's browser add-on at tools.google.com/dlpage/gaoptout or by blocking cookies in your browser. Our website uses Google reCAPTCHA to protect forms from spam, and appointment scheduling through Calendly; information you enter there is also handled under those companies' own privacy policies.

Our website is intended for adults in the United States. We do not knowingly collect information from children under 13.

FORM ADV

Our Form ADV Part 2A brochure describes our services, fees and conflicts of interest. It is available on the SEC's Investment Adviser Public Disclosure website at adviserinfo.sec.gov/firm/summary/308965 (CRD 308965), and we will send you a copy free of charge on request.

CHANGES TO THIS POLICY

We may update this policy. We will post the current version on this page with its effective date and, when the law requires it, send it to our clients.

CONTACT US

Questions about this policy or our privacy practices:

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Attn: Vincent M Farasciano

Owner & Chief Compliance Officer