



**Revision Dated: March 26, 2025**

## **DAVIVIENDA ADVISORS' PRIVACY NOTICE**

### **Introduction**

As a registered investment adviser, Davivienda Investment Advisor USA LLC d/b/a Davivienda Advisors ("Davivienda") must adhere to SEC Regulation S-P, which mandates registered advisers to implement policies and procedures safeguarding customers' "non-public personal information." This includes non-public "personally identifiable financial information" and any related data. Such details can encompass personal financial data, transaction records, advice offered by Davivienda, and analyses arising from nonpublic personal data. Furthermore, the necessity for investment advisers like Davivienda to safeguard their clients' information is underscored by the Gramm-Leach-Bliley Act Privacy Safeguards Rule, 16 CFR Part 314. The Gramm-Leach-Bliley Act (GLBA), passed in November 1999, set boundaries on sharing consumer information accumulated by financial establishments with third-party entities. Most firms in the financial sector are governed by these federal guidelines, with many also subject to upcoming state privacy laws. Federal privacy rules stemming from Title V of the GLBA were operationalized on November 13, 2000, compelling financial institutions to draft comprehensive privacy policies and annually update customers with privacy notices.

### **Overview**

This Privacy Notice explains Davivienda Advisors' practices and applies to current and former customers' non-public personally identifiable data. Prioritizing its customers' data confidentiality, Davivienda has set policies and procedures to ensure data remains private and secure, as the federal Gramm-Leach-Bliley Act dictates.

Davivienda and its workforce do not divulge non-public personal details about its present or past clients to unaffiliated third parties, barring lawful permissions. While serving a client, Davivienda may divulge necessary details to service providers, such as transfer agents, custodians, broker-dealers, consultants, accountants, and lawyers. Federal and state securities regulators can inspect our company and client records within legal confines.

Davivienda limits in-house access to clients' non-public personal details to staff members who require this data to offer client services. Emphasizing our commitment, we never sell data about existing or former clients or their accounts. Moreover, we refrain from sharing data unless it's essential for a transaction, at a client's behest, or as mandated by law.

### **Third-Party Providers**

Davivienda Advisors engages third-party service providers who may collect, retain, and store certain client information necessary to deliver their services. By contractual agreement, these third-party providers are strictly obligated to safeguard your data, adhere to stringent confidentiality standards, and are prohibited from sharing your information with unauthorized parties, except as explicitly permitted under our contractual arrangements.



## **Safeguarding of Client Records and Information**

Davivienda Advisors has activated protocols to maintain accurate client data records. If clients spot discrepancies in the company record, they can contact Davivienda for timely rectification. Electronic defenses, including passwords and firewalls, secure this data.

## **Security of Client Information**

Davivienda has erected physical, electronic, and procedural barriers to shield and maintain the confidentiality of client data. Internally, data access is restricted to employees who require information to serve clients. Employee training emphasizes strict compliance with these principles.

## **Privacy Notice**

Davivienda has fashioned this Privacy Notice, per Regulation S-P, which will be presented to clients initially and annually. This notice communicates our practices concerning information handling and is crafted to be transparent and conspicuous. The notice will be updated as needed when information practices shift.

## **Privacy Notice Delivery**

**Initial Privacy Notice** — New clients receive this notice when initiating the client relationship, such as upon signing the service agreement.

**Annual Privacy Notice** — As GLBA regulations prescribe, the Privacy Policy is disclosed annually. Davivienda will distribute its annual Privacy Notice and Form ADV Part II offering.

## **Policy Notice Update: Enhanced Protection of Customer Information**

**Update Date:** May 16, 2024

The SEC has adopted amendments to Regulation S-P to enhance the protection of customers' nonpublic personal information. These changes require registered investment advisers, including Davivienda Advisors, to implement an incident response program designed to detect, respond to, and recover from unauthorized access to customer information. In compliance with the new rule, Davivienda Advisors will notify clients immediately and no later than 30 days after detecting any data breach involving sensitive information. Our notification will include detailed information about the breach, the data involved, and steps clients can take to protect themselves. This ensures robust safeguards and timely communication to enhance the security of our client's financial data.

## **Revised Privacy Notice**

Should Davivienda practices related to data collection, sharing, or security be altered, Regulation S-P mandates amending the Privacy Policy and disseminating a revised notice to clients.



Additionally, Davivienda Advisors may share your information with affiliated entities for marketing purposes. You can opt out of this sharing arrangement at any time. Should you wish to limit sharing your information, please call 011-57-6012413444 or email [support@daviviendaadvisors.com](mailto:support@daviviendaadvisors.com) to process your request.