

Revision Dated: May 25, 2026

DAVIVIENDA ADVISORS' PRIVACY POLICY

Introduction

As a registered investment adviser, Davivienda Investment Advisor USA LLC d/b/a Davivienda Advisors ("Davivienda") must adhere to SEC Regulation S-P (17 CFR Part 248), which mandates registered advisers to implement policies and procedures safeguarding customers' "nonpublic personal information." This includes non-public "personally identifiable financial information" and any related data. Such details can include personal financial data, transaction records, advice provided by Davivienda, and analyses derived from nonpublic personal data. The need for investment advisers like Davivienda to safeguard their clients' information is further underscored by the Gramm-Leach-Bliley Act Privacy Safeguards Rule (16 CFR Part 314). In addition, SEC Regulation S-AM (17 CFR Part 248, Subpart B) governs the circumstances under which a financial institution or its affiliates may use certain consumer information obtained through affiliate sharing for marketing purposes, and requires that consumers be provided with a clear and conspicuous notice and a reasonable opportunity to opt out before such information is used for marketing solicitations.

Overview

This Privacy Policy explains Davivienda Advisors' practices and applies to the nonpublic, personally identifiable data of current and former customers. Prioritizing its customers' data confidentiality, Davivienda has established policies and procedures to ensure data remains private and secure, as required by the federal Gramm-Leach-Bliley Act.

Davivienda and its workforce do not divulge nonpublic personal information about its present or past clients to unaffiliated third parties, except with lawful permission. While serving a client, Davivienda may disclose necessary information to service providers, including transfer agents, custodians, broker-dealers, consultants, accountants, and lawyers. Federal and state securities regulators can inspect our company's and clients' records within the law.

Davivienda limits in-house access to clients' nonpublic personal data to staff members who require it to provide 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 is essential for a transaction, at a client's behest, or as mandated by law.

Information We Collect

Davivienda Advisors collects nonpublic personal information from the following sources:

- Information received on applications or other forms, including name, address, date of birth, Social Security number or tax identification number, financial situation, income, net worth, and investment experience.
- Information about client transactions with the Adviser or others, including account balances, transaction history, and payment records.
- Information received from consumer reporting agencies and other third parties.

- Information collected through the digital onboarding platform operated by **Xendia Wealth LLC** (formerly BCP Advisors LLC, d/b/a BCP Global), including responses to the client risk questionnaire and Know Your Customer (KYC) documentation.

Sharing with Nonaffiliated Third Parties

Davivienda Advisors does not share nonpublic personal information about clients or former clients with nonaffiliated third parties, except in the following circumstances:

- As necessary to process a transaction that a client has requested.
- To the extent the client has specifically authorized the disclosure.
- To service providers who have entered into contractual agreements requiring them to maintain the confidentiality of client information and to use it only for the purposes for which it was disclosed.
- As required or expressly permitted by law, or as reasonably necessary to prevent fraud, unauthorized transactions, or liability.

The Adviser does not share client information with nonaffiliated third parties for marketing purposes.

Third-Party Service Providers

Davivienda Advisors engages the following primary third-party service providers who may collect, retain, and store certain client information necessary to deliver their services:

Xendia Wealth LLC (formerly BCP Advisors LLC, d/b/a BCP Global): Provides technology and onboarding infrastructure for the Adviser's digital advisory platform. Client information collected during the onboarding process, including KYC documentation and risk questionnaire responses, is processed and stored on **Xendia's** platform.

Interactive Brokers LLC: Serves as the qualified custodian for client accounts. Client identifying information, account data, and transaction records are maintained by Interactive Brokers in connection with its custodial services.

By contractual agreement, these third-party providers are strictly obligated to safeguard client data, adhere to stringent confidentiality standards, and are prohibited from sharing client information with unauthorized parties, except as explicitly permitted under our contractual arrangements. All service provider agreements are reviewed periodically by the Chief Compliance Officer to confirm that contractual provisions addressing data security, breach notification, and information handling remain current and adequate.

Affiliate Information Sharing

As part of a financial group that includes entities operating in banking, brokerage, and insurance, Davivienda Advisors shares certain nonpublic personal information with affiliated entities in connection with the advisory services provided to clients.

Affiliate receiving shared information: Davivienda International, an international branch of Banco Davivienda S.A. (Colombia), operating in Miami, Florida, regulated and supervised by the Federal Reserve (FED) and the Florida Office of Financial Regulation (OFR).

Information shared with this affiliate is limited to the following purposes:

- Account opening and maintenance
- Account servicing
- Regulatory compliance and anti-money laundering obligations
- Fraud prevention and detection

Client information collected during the digital onboarding process through **Xendia Wealth LLC's** platform (formerly BCP Global) may be shared with Davivienda International's back office in Miami for account review and, where applicable, to facilitate the opening of corresponding accounts at the branch, thereby avoiding the need to request documents from the client a second time.

This sharing is necessary to service client accounts and to comply with applicable law. It is not subject to client opt-out rights under Regulation S-P.

Affiliate Marketing — Regulation S-AM Compliance

In addition to sharing client information for the operational and compliance purposes described above, Davivienda Advisors may share certain nonpublic personal information with affiliated entities so that those affiliates may market their own products and services to you. This section describes Davivienda Advisors' affiliate marketing sharing practices and your rights under SEC Regulation S-AM (17 CFR Part 248, Subpart B).

Affiliate(s) that may receive your information for marketing purposes: Davivienda International, an international branch of Banco Davivienda S.A. (Colombia), operating in Miami, Florida.

Types of information that may be shared for marketing purposes: Information that may be shared with affiliates for their marketing purposes includes your name, contact information, account type, and general financial profile. Sensitive information such as Social Security numbers, account numbers, and detailed transaction records will not be shared for marketing purposes.

How affiliates may use this information: Affiliated entities that receive your information under this section may use it to contact you regarding banking, brokerage, insurance, or other financial products and services offered by that affiliate. The affiliate may contact you by mail, email, telephone, or other means of communication.

Your right to opt out of affiliate marketing: Under SEC Regulation S-AM, you have the right to opt out of having your nonpublic personal information shared with our affiliates for their marketing purposes. If you opt out, Davivienda Advisors will not share your information with affiliated entities for marketing solicitations. Your opt-out election will not affect information shared for account servicing, regulatory compliance, fraud prevention, or other operational purposes described elsewhere in this Privacy Policy.

You are not required to consent to affiliate marketing as a condition of receiving advisory services from Davivienda Advisors. Opting out will have no effect on the quality or scope of the advisory services provided to you.

How to opt out: You may opt out of affiliate marketing sharing at any time by contacting Davivienda Advisors using any of the following methods:

- By telephone: Call (601) 241-3444

- By email: Send your request to support@daviviendaadvisors.com with the subject line “Opt-Out of Affiliate Marketing”
- By mail: Write to Davivienda Advisors, Attn: Chief Compliance Officer, 1110 Brickell Avenue, Suite 900B, Miami, FL 33131

Your opt-out election will take effect within a reasonable period after receipt of your request, generally no more than 30 days. Your opt-out will remain in effect unless you revoke it in writing. If you have previously opted out and wish to allow affiliate marketing sharing, you may contact us at any time to revoke your opt-out election.

Opt-Out Rights

Under Regulation S-P and Regulation S-AM, clients have the right to opt out of certain categories of information sharing. The following is a summary of your opt-out rights:

Sharing NOT subject to opt-out: Information shared with affiliated entities (Davivienda International) for account opening, servicing, regulatory compliance, anti-money laundering obligations, and fraud prevention. Information shared with nonaffiliated service providers (**Xendia Wealth LLC**, formerly BCP Global, and Interactive Brokers) as necessary to service client accounts, process transactions, or comply with legal requirements. These categories of sharing are necessary to maintain your account and to comply with applicable law

Sharing subject to opt-out under Regulation S-P: Any sharing of client financial information with nonaffiliated third parties for purposes other than account servicing, legal compliance, transaction processing, or fraud prevention. As of the date of this notice, the Adviser does not engage in any such sharing with nonaffiliated third parties. If the Adviser changes its policies to allow additional disclosures of nonpublic personal information to nonaffiliated third parties, clients will be notified in advance and provided a reasonable opportunity to opt out of such disclosures.

Affiliate marketing opt-out under Regulation S-AM: As described in the Affiliate Marketing section of this Privacy Policy, Davivienda Advisors may share certain nonpublic personal information with affiliated entities so that those affiliates may market their own products and services to you. You have the right to opt out of this sharing at any time. If you opt out, your information will not be shared with affiliates for marketing purposes, but will continue to be shared as necessary for account servicing, regulatory compliance, and fraud prevention. Your opt-out election will remain in effect unless you revoke it in writing. You are never required to consent to affiliate marketing as a condition of receiving advisory services. For instructions on exercising your opt-out right, please refer to the Affiliate Marketing section above or contact us using the information below.

Contact us regarding your opt-out rights: Should you wish to exercise any opt-out right described in this notice, limit the sharing of your information, or if you have questions regarding your privacy rights, you may contact us by calling (601) 241-3444, by sending an email to support@daviviendaadvisors.com, or by writing to Davivienda Advisors, Attn: Chief Compliance Officer, 1110 Brickell Avenue, Suite 900B, Miami, FL 33131.

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, firewalls, and encryption, 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 Policy Delivery

Initial Privacy Policy — New clients receive this notice when initiating the client relationship. For clients onboarded through the digital platform, the Privacy Policy is presented before any financial or risk assessment information is collected, and the client must affirmatively acknowledge receipt before proceeding with onboarding. A timestamped record of each client's acknowledgment is retained.

Annual Privacy Policy — As required by GLBA regulations, the Privacy Policy is disclosed annually. Davivienda will distribute its annual Privacy Policy alongside the delivery of the updated Form ADV Part 2A brochure.

2024 Regulation S-P Amendments — Enhanced Protection of Customer Information

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 the following:

Incident Response Program. The Adviser has implemented an incident response program designed to detect, respond to, and recover from unauthorized access to or use of customer information. The program addresses data flows across all entities that handle client information, including the **Xendia** onboarding platform (formerly BCP Global), Interactive Brokers' custodial systems, and Davivienda International's back-office operations in Miami. In compliance with the amended rule, Davivienda Advisors will provide required notices to affected individuals in accordance with Regulation S-P, including within the applicable regulatory timeframe when a notification obligation is triggered. The notification will include detailed information about the breach, the data involved, and steps clients can take to protect themselves.

Service Provider Oversight. The Adviser requires, by contract, that all service providers with access to client information maintain safeguards appropriate to the sensitivity of the information they receive. The Chief Compliance Officer periodically reviews existing agreements with **Xendia Wealth LLC**, Interactive Brokers, and Davivienda International to confirm that contractual provisions addressing data security, breach notification, and information handling are in place and up to date.

Data Retention and Disposal. The Adviser maintains a data retention schedule and disposal policy governing the secure destruction of client information that is no longer required for business or regulatory purposes. The policy covers both electronic and physical records, including information stored on the **Xendia** platform and any documents shared with Davivienda

International. Disposal methods include secure electronic deletion and physical shredding, as appropriate.

Revised Privacy Policy

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

Consistency with Form ADV Part 2A

The information contained in this Privacy Policy is consistent with the privacy disclosures in the Adviser's Form ADV Part 2A Brochure and Wrap Fee Program Brochure. The affiliate relationships, data-sharing practices, and affiliate marketing disclosures described in this Privacy Policy correspond to the disclosures in Item 10. C (Material Relationships with Affiliated Entities) and the Privacy Policy section of the Form ADV Part 2A. The Chief Compliance Officer is responsible for reconciling these documents whenever material changes are made to the Adviser's privacy practices, affiliate relationships, or affiliate marketing policies, and for ensuring continued compliance with Regulation S-P and Regulation S-AM.

Contact Information

For more information about Davivienda Advisors' privacy policies or to request a copy of this Privacy Policy, contact us at:

- Phone: (601) 241-3444
- Email: support@daviviendaadvisors.com
- Website: <https://www.daviviendaadvisors.com>