

WORTH ASSET MANAGEMENT PRIVACY POLICY

Worth Asset Management strongly believes in protecting the confidentiality and security of information we collect from you, our customer.

How and Why We Obtain Information

In order to facilitate the serving of your account, Worth Asset Management may receive nonpublic personal information about you from you or any of the following sources:

1. from your applications or forms (examples include name, address, social security number, driver's license number, birth date, beneficiaries, assets, and income)
2. from transactional activity in your account (examples include trading history and balances)
3. from verification services and consumer reporting agencies (to ensure accuracy of application data, or to assess creditworthiness if you apply for our credit products)
4. from other sources with your consent or with the consent of your broker dealer.

We verify our customer's identity to actively prevent, deter, and detect illegal financial activity. Pursuant to the USA Patriot Act, all customers who open new accounts with Worth Asset Management will be required to provide identification verification documents to help establish their identity including your driver's license or other identifying documents.

Nonpublic Personal Information We Disclose

We do not disclose the nonpublic personal information we collect about our customers to anyone except:

1. in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers etc.)
2. to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.)
3. our attorneys, accountants, regulatory agencies and auditors
4. as otherwise provided by law*

We do not disclose the nonpublic personal information we collect about our former customers to anyone except:

1. to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.)
2. our attorneys, accountants, regulatory agencies and auditors
3. as otherwise provided by law*

* We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose. If you decide at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

We maintain records containing nonpublic information of former customers for the required retention period by federal and state securities laws. After that time, information may be destroyed.

How We Protect Your Information

Worth Asset Management has always considered the protection of sensitive information to be a sound business practice and a foundation of customer trust. We employ extensive information protection controls in keeping with industry standards and practices, and we regularly adapt these physical, electronic, and procedural controls to respond to changing requirements and advances in technology.

Within Worth Asset Management and among our service providers, we restrict access to your information to those who require that access in order to provide products and services to you. We do not sell your personal information to anyone. We may share the personal information that we collect about our customers, prospects, or former customers with their broker dealers or with:

Affiliates—including affiliated service providers (for example, our data processing company, Internet backup provider and printing operation). You do not have the option to opt out of information provided to Affiliates.

Unaffiliated service providers (for example, fulfillment companies, portfolio reporting software and securities clearinghouses).

Government agencies and law enforcement officials (for example, for tax reporting or under court order)

Other organizations, as permitted by the laws that protect your privacy (such as fraud prevention)

Other organizations, with your consent or as directed by your financial advisor.

Other employees with a valid business reason have access to your personal information. These employees are educated on the importance of maintaining the confidentiality and security of this information. They are required to abide by our information handling practices.

Your personal investment advisor with Worth Asset Management has access to your nonpublic personal information. This access is gained through copies of new account forms and/or access to vendor or custodial firms (Charles Schwab) systems that display this information. In the event of your investment advisor leaving or terminating his or her registration with Worth Asset Management it is likely he or she will maintain your nonpublic personal information and may use this information in his or her attempt to transfer your account to his or her new firm.

The law allows you to "opt out" of only certain kinds of information sharing with third parties. Worth Asset Management does not share personal information about you with any third parties that triggers this opt-out right. This means **YOU ARE ALREADY OPTED OUT.**

Privacy Online

Worth Asset Management considers privacy, security, and service to be just as critical in the online environment as in the rest of our operation. We therefore employ all of the safeguards described above, along with the following Internet-specific practices:

Worth Asset Management, along with its custodial firms use a variety of proven protections to maintain the security of your online session. For example, we make extensive use of firewall barriers, encryption

techniques and authentication procedures. We also use cookies and similar files that may be placed on your hard drive for security purposes, to facilitate site navigation, and to personalize the appearance of the site. When we conduct business online, we may collect technical and navigational information, such as computer browser type, internet protocol address, pages visited, and average time spent on our Website. This information may be used, for example, to alert you to software compatibility issues; or it may be analyzed to improve the Web design and its functionality.

SMS Disclaimer

By providing my phone number to Worth Asset Management, I agree and acknowledge that Worth Asset Management may send text messages to my wireless phone number for any purpose. Message frequency will vary, and Message and data rates may apply. If you need further assistance, please reply "HELP". You can also opt out by replying "STOP." For more information on how your data will be handled, please contact us at the address, phone number or email address shown below.

Access to Your Information

You may access your account through a variety of media offered by Worth Asset Management and our custodial firms (ie. statements or online services). Contact your investment advisor if you require any additional information.

For more information – If you have questions about our privacy policy, you can contact us at: Worth

Asset Management Inc.
16660 Dallas Parkway, Suite 1000
Dallas TX 75248
Business phone: (469) 257-5074
Email: info@worthassetmgmt.com

Worth Asset Management

Business Continuity Plan Disclosure Statement

Worth Asset Management has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption, you cannot contact us as you usually do at (469) 257-5074, you should call our alternative number (888) 304-9115. If you cannot access us through either of those means, and you have a brokerage account carried with Charles Schwab you should contact them.

Worth Asset Management has approved one custodial firm to hold customer accounts, Charles Schwab & Co., (“Charles Schwab”). Customers may contact Charles Schwab at (800) 435-4000. Their Internet address is <https://www.schwab.com/contact-us> . Charles Schwab corporate address is 3000 Schwab Way, Westlake TX 76262.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank, and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Charles Schwab backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised Charles Schwab that their objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within the next business day. Your orders and requests for funds and securities could be delayed during this period.

Vendor Contacts – Worth relies on various outside vendors to process our business. The primary vendors are our two custodial firms listed above. Listed below are vendors that Worth may rely on to keep our business in place during a significant disruption:

1. Black Diamond / Advent – portfolio reporting
(904) 565-5751, Brooks Lee, (904) 565-5743, brooks.lee@sscinc.com
2. Wealthbox – CRM, customer contacts and review notes, firm workflows and tracking
support@wealthbox.com , <https://www.wealthbox.com/get-help/> ,
3. RIA Compliance – outside compliance
(682) 233-0628, Teresa Douberly, teresa@riacomplianceconcepts.com
4. Dropbox – cloud-based file hosting service
<https://www.dropbox.com/>
(800) 620-5395
5. MirrorWeb / Appraver email hosting and archiving

(302) 597-7340, customersuccess@mirrorweb.com

6. The Technology Firm – IT support

Fred Rushing, (214) 257-0152, frushing@technologyfirm.com

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within one business day. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, recover and resume business within three business days. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through email, our web site (worthassetmgmt.com) or by telephone. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at:

Worth Asset Management Inc.

16660 Dallas Parkway, Suite 1000

Dallas TX 75248

Business phone: (469) 257-5074

Email: info@worthassetmgmt.com