

ANALYTIC EDGE FINANCE

Privacy Policy

Effective Date: October 2026

Version: 2.1

Our Commitment to Your Privacy

Analytic Edge Finance (“we,” “us,” or “the Firm”) is committed to protecting the privacy and confidentiality of nonpublic personal information concerning prospective, current, and former clients. We maintain this Privacy Policy pursuant to the Gramm-Leach-Bliley Act and other applicable federal and state privacy and information-security laws.

Information We Collect

(a) Information you provide directly

- Name, address, date of birth, Social Security number, tax identification numbers
- Account applications, financial questionnaires, risk tolerance assessments
- Investment objectives, time horizons, income, and net worth information
- Correspondence and communications with our firm

(b) Information about your accounts and transactions

- Account numbers, account balances, and investment holdings
- Trade history, cost basis records, lot-level transaction data
- Performance history and benchmark comparisons

(c) Information from third-party sources

- Account-level data from custodians (e.g., Charles Schwab & Co.) via data delivery feeds
- Market data and security reference data from financial data providers
- Publicly available information such as FINRA BrokerCheck or SEC EDGAR records
- For a list of all third party sources, a request can be made directly through our contact email address or phone number.

How We Use Your Information

- Deliver investment management and advisory services
- Build, manage, and document your personalized investment portfolio and Investment Policy Statement (IPS)
- Monitor portfolio performance and rebalancing requirements
- Generate compliance documentation including trade blotters and regulatory filings
- Develop, test, and operate proprietary technology tools used in delivering our services
- Meet our legal, regulatory, and compliance obligations under applicable federal and state law

ANALYTIC EDGE FINANCE

Privacy Policy

- Detect, prevent, and respond to fraud and data security incidents

When and With Whom We Share Your Information

We do not sell your nonpublic personal information. We do not share your information with unaffiliated third parties for their own marketing purposes.

Category 1 — Compliance and Professional Service Providers

We share information with attorneys, accountants, auditors, and compliance consultants who assist us in meeting our legal and regulatory obligations. These parties are contractually prohibited from using your information for any other purpose.

Client opt-out: Not applicable to disclosures made to professional service providers as permitted by law.

Category 2 — Custodians and Brokerage Platforms

We work with custodians (currently Charles Schwab & Co.) to hold client assets, execute transactions, and provide account-level data. Information shared with custodians is governed by your account agreements with those institutions.

Client opt-out: Not applicable to disclosures made to custodians and brokerage platforms as permitted by law.

Category 3 — Technology Development and Firm Infrastructure Partners

To build, test, improve, and operate proprietary firm technology — including portfolio management systems, trade blotters, IPS generation tools, compliance tracking systems, and client reporting infrastructure — we engage authorized third-party technology development partners who may access account numbers, holdings, balances, and transaction history.

⚠ Sensitive personal identifiers (including Social Security numbers) will not be shared with technology partners except where strictly necessary for system integration testing, and only under explicit written authorization and data minimization controls.

All technology partners are required by written contract to:

- Use data solely for firm infrastructure development and testing purposes
- Implement data security safeguards meeting or exceeding federal standards
- Notify the Firm of any data security incident within 72 hours of discovery
- Prohibit re-disclosure, secondary use, or retention beyond the engagement
- Return or securely destroy all client data upon completion of the engagement

Client opt-out: Not applicable to disclosures made to service providers as permitted by law.

ANALYTIC EDGE FINANCE

Privacy Policy

Category 4 — Legal and Regulatory Disclosure

We may disclose your information when required by law, regulation, legal process, or governmental authority — including SEC, FINRA, or state regulator examinations.

Client opt-out: Not applicable.

Former Clients

AEF may retain former-client information indefinitely, including the identifying, financial-profile, account, transaction, investment, communication, and advisory-record categories described in this Privacy Policy.

AEF may disclose that information to the same recipient categories described above: custodians and brokerage platforms; financial-planning, client-relationship-management, cloud, records-management, and technology providers; compliance, accounting, legal, and audit professionals; and governmental, regulatory, or legal authorities. Certain providers may retain it in their own systems while providing services to AEF or the former client.

AEF does not share former-client information with affiliates, sell it, or disclose it for independent marketing. The same confidentiality and security safeguards apply to current- and former-client information.

Data Security

- Restricted access controls limiting data access to authorized personnel only
- Encryption of data in transit and at rest where technically feasible
- Formal vendor oversight including due diligence on service provider data security practices
- A written Incident Response Program governing our response to data security incidents
- Periodic review of security practices and procedures

Data Breach Notification

AEF will investigate suspected unauthorized access to or use of nonpublic personal information and provide notices to affected individuals, regulators, law enforcement, and other parties within the timeframes required by applicable federal and state law. Any notice will describe the incident and the information and responsive steps required by applicable law.

Delivery of Privacy Policy

AEF provides this Privacy Policy with its Form ADV brochure no later than establishment of the client relationship and documents the date and method of delivery. Revised or annual notices will be provided when required by law.

ANALYTIC EDGE FINANCE

Privacy Policy

Contact Us

Email: thomas.wilke@analyticedgefinance.com

Phone: (214) 851-5798

Address: 9330 Lyndon B Johnson Hwy, Floor 9, Suite 976, Dallas, Texas 75243

Website: www.analyticedgefinance.com

This Privacy Policy is issued pursuant to the Gramm-Leach-Bliley Act and applicable federal and state privacy and information-security laws. Effective October 2026.