Privacy Policy

July 30, 2026

EmeraldSpark Investments, LLC ("EmeraldSpark," "Advisor," "we," or "us") is committed to maintaining the confidentiality, integrity, and security of personal information about our current and prospective clients and our business partners and their clients. This Privacy Policy describes how we collect, use, share, and protect non-public personal information ("NPI") in accordance with applicable state securities laws and the NASAA Information Security and Privacy Model Rule.

1. Information We Collect

In the course of providing investment advisory services, we may collect NPI about you from the following sources:

- Information you provide on applications, advisory agreements, financial plans, questionnaires, or other forms (such as your name, address, Social Security number, date of birth, income, net worth, investment objectives, and risk tolerance).
- Information about your accounts and transactions with us, our affiliates, and others, such as custodians, broker-dealers, and administrators (including account balances, holdings, trading activity, and fee billing data).
- Information obtained during conversations, emails, and meetings between you and our personnel, including notes reflecting your financial situation and goals.
- Information received from third parties and service providers you authorize, such as custodians, banks, accountants, or attorneys.

2. How We Use Your Information

We use NPI solely for legitimate business purposes in connection with providing investment advisory and related services, including:

- Establishing and maintaining your advisory relationship and accounts.
- Developing and implementing investment recommendations and financial plans.
- Communicating with you about your accounts, performance, and our services.
- Complying with applicable legal, regulatory, and reporting obligations.
- Managing our internal operations, risk, and compliance programs.

We do not sell your personal information.

3. Information Sharing

We will share NPI only as necessary to service your accounts, support our operations, and comply with law:

- With custodians, broker-dealers, and other financial institutions you select or that we use to execute transactions and safeguard assets.
- With service providers that perform services on our behalf (such as portfolio reporting, accounting, data storage, and electronic signature providers), subject to contractual and technological safeguards.
- With regulators, law enforcement, or other parties as required or permitted by law (for example, in response to subpoenas or regulatory examinations).

We do not disclose NPI about current or former clients to non-affiliated third parties for marketing purposes, except as permitted by law and with your consent where required.

If you close your account(s) with EmeraldSpark or become an inactive client, we will continue to protect your information and apply this Privacy Policy to you as described in this notice.

4. How We Protect Your Information

EmeraldSpark maintains administrative, technical, and physical safeguards designed to protect NPI against unauthorized access, use, or disclosure.

These safeguards include, among others:

- Limiting access to NPI to personnel and service providers who need it to perform their duties.
- Using secure technologies and practices to protect electronic records, such as encryption in transit and at rest, multi-factor authentication, strong password standards, and secure configuration of cloud-based systems
- Maintaining backup and recovery procedures for books and records as described in our Business Continuity Plan.
- Periodically reviewing our information-security controls and vendor practices and updating them as appropriate.

5. Your Choices and Rights

You may:

- Request that we correct or update inaccurate information we maintain about you.
- Request additional information about how we handle your NPI.
- Withdraw certain authorizations or consents you have provided, subject to applicable law and the terms of your agreements with us (noting that some withdrawals may affect our ability to continue providing services).

To exercise these rights, please contact us using the information below.

6. Delivery and Updates of This Policy

We will provide this Privacy Policy to you at the time you become a client and at least annually thereafter, as required by applicable regulations. If any information in this Privacy Policy becomes materially inaccurate, we will promptly update the policy and deliver the amended version to you.

7. Contact Information

If you have questions about this Privacy Policy or our information-handling practices, please contact:

Ryan Layton, CFA
Phone: 612-810-2230
Email: ryan@emeraldspark.com