

Facts		What does Noesis Capital Management (NOESIS) do with your personal information?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social security number</li> <li>▪ Date of birth</li> <li>▪ Income/assets</li> <li>▪ Driver's license/passport information</li> <li>▪ Transaction history</li> <li>▪ Account numbers</li> </ul> <p>As required by law, when you are <i>no longer</i> our customer, we will continue to hold your information and share it as described in this notice.</p>	
How?	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information, the reasons we choose to share, and whether you can limit this sharing.	

Reasons we can share your personal information	Does NOESIS Share?	Can you limit this sharing?
<b>For our everyday business purposes</b> - such as to process your transactions, determine your suitability for services and maintain your account(s).	<YES>	<NO>
We share your personal information with the firm's attorneys, accountants and auditors or others determining compliance with industry standards or to respond to court orders and/or legal investigations.	<YES>	<NO>
<b>For our marketing purposes</b> – information about you with third parties to offer our products and services to you.	<NO>	<We do not share>
<b>For joint marketing with other affiliated financial companies.</b>	<YES>	<YES>
<b>For our affiliates' everyday business purposes</b> - information about your transactions and experiences.	<YES>	<YES>
<b>For our affiliates' everyday business purposes</b> – information about your creditworthiness.	<NO>	<We do not share>
<b>For non-affiliates to market to you.</b>	<NO>	<We do not share>

Questions?	<b>NOESIS CAPITAL MANAGEMENT/</b> Attn: Chief Compliance Officer/ Phone Number: 561-999-9888 2700 Military Trail, Suite 210 Boca Raton, Florida 33431 U.S.A.
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Who We Are	
Who is providing this notice?	Noesis Capital Management and its affiliates. Our affiliates include the following: <ul style="list-style-type: none"> <li>▪ Noesis B.V, (an investment adviser located in the Netherlands)</li> </ul>

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies.

Non-Affiliates	Companies not related by common ownership or control. They can be financial and non-financial companies. Non-affiliates we may share information with include an independent representative's new brokerage or an investment advisory firm.
Joint Marketing	A formal agreement between non-affiliates financial companies that together market financial products or services to you: <ul style="list-style-type: none"> <li>▪ This may include banks, credit unions or other financial institutions with which we have a joint marketing agreement</li> </ul>

**Other Important Information**

Information for California, North Dakota, and Vermont Customers:  
In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.

California, North Dakota, and Vermont Clients have other protections under state law. If your primary mailing address is in California or Vermont, we will not share your credit or financial information that we collect except as permitted by law, including, for example, with your consent or to service your account. We will also not use your information for joint marketing purposes. We do not share client information with third parties except as permitted by law.

California residents may be eligible to exercise consumer privacy rights under the California Consumer Privacy Act or "CCPA" (Cal Civ. Code §1798.100 et seq.). This notice is provided according to the CCPA, and, if eligible, you may exercise the following rights. You have the right to know about the personal information collected, disclosed, or sold. Please contact as directed above or use the mail-in form below.

1. We may collect information about your employment, financial, location, and government-issued information.
2. We may obtain personal information directly from the individual or government entities to provide, maintain and service your account(s). We may also utilize this information for:
  - compliance/legal and regulatory purposes
  - identity protection/fraud prevention/safety and security
  - client concerns/complaints
3. We may provide information to the following third (3rd) parties to process transactions and maintenance of accounts:
  - Service providers
  - Operating systems and platforms
  - Government entities
  - Data analytics
  - Affiliates

Important information for Nevada residents – At any time, you may request to be placed on SWM's internal do-not-call list by calling us at 1-561-999-9888. Nevada law requires that we provide you with the following contact information to enable you to obtain further information: (i) Noesis at our contact information, listed above; and (ii) Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Street, Suite 3900, Las Vegas, Nevada 89101, Phone: 1-702-486-3132, Email: BCPINFO@ag.state.nv.us.

**What We Do**

How does NOESIS protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with state and federal laws. These measures include limiting your information to exposure from unauthorized individuals, certain computer safeguards and secured files and buildings. Our online environment uses security technologies, including layered security and access controls over personal information. For further information, please visit our website or call us directly at 302-427-9600.
How does NOESIS collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> <li>▪ Open an account</li> <li>▪ Enter into an investment advisory agreement</li> <li>▪ Seek advice about investments</li> <li>▪ Tell us about your investment or retirement portfolio</li> <li>▪ Seek advice about tax preparation and tax planning</li> </ul> We also collect your personal information from others such as affiliates or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only: <ul style="list-style-type: none"> <li>▪ Sharing for affiliates' everyday business purposes—information about your creditworthiness</li> </ul>

▪ Affiliates from using your information to market to you  
▪ Sharing for non-affiliates to market to you  
State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

What happens when I limit sharing for an account I hold jointly with someone else? Your choices will apply to everyone on your account.

**Mail-In Form**

**Privacy Choices Notice**

If you would like to limit the personal information where applicable, please email our firm's Chief Compliance Officer at: [nletschert@noesis-capital.com](mailto:nletschert@noesis-capital.com) or complete and mail the following form to:

**NOESIS CAPITAL MANAGEMENT/** Attn: Chief Compliance Officer  
2700 Military Trail, Suite 210  
Boca Raton, Florida 33431 U.S.A.  
Phone Number: 561-999-9888

You can withdraw your opt-out choice at any time by contacting us by email or in writing at the address provided above. If you limit sharing information to our affiliates, you will not be able to receive combined services with our affiliate until you revoke the limitation on sharing information.

NOESIS does not permit financial professionals to port your information to a new investment advisor or financial institution when they terminate employment with our firm. If your primary address is in a state that requires your affirmative consent to share your personal information with the New Firm, then you must give your written consent before we will allow your financial advisor to take any of your personal information to that New Firm.

*By completing and returning this form as described, I am instructing NOESIS to limit the personal information about me where applicable and any information that my financial advisor could disclose or take if he or she moves to a brokerage or investment advisory firm upon termination of the relationship with NOESIS. However, I understand that NOESIS may disclose my name, address, telephone number, email and the account title of the accounts serviced by my advisor to any brokerage or investment advisory firm as allowed under federal and certain state laws.*

**\*\*Please note that for accounts held jointly by two or more persons, the privacy choices made by any account holder apply to all joint holders with respect to the account.**

In order for your opt-out election to be effective, you must complete ALL of the following information:

Name (please print clearly): \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State/Zip: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_