

## FACTS

### WHAT DOES ADVISORY ALPHA, LLC 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?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- account numbers and balances
- wage and salary information
- information about your assets and properties

When you are *no longer* our customer, we continue to share your information as described in this notice.

#### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Advisory Alpha, LLC chooses to share; and whether you can limit this sharing.

#### Reasons we can share your personal information

#### Does Advisory Alpha, LLC share?

#### Can you limit this sharing?

##### **For our everyday business purposes—**

such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus

Yes

No, this is a permissible reason for sharing personal information and is necessary for our day-to-day operations.

##### **For our marketing purposes—**

to offer our products and services to you

Yes

No

##### **For joint marketing with other financial companies**

No

We don't share.

##### **For our affiliates' everyday business purposes—**

information about your transactions and experiences

Yes

No

##### **For our affiliates' everyday business purposes—**

information about your creditworthiness

No

We don't share.

##### **For our affiliates to market to you**

Yes

Yes, by notifying your investment adviser representative.

**For nonaffiliates to market to you –** only our investment adviser representatives work with unaffiliated insurance marketing organizations when recommending insurance products and will share client information with those entities who may market other insurance products

Yes

Yes, by notifying your investment adviser representative.

**For nonaffiliates to market to you – representative departures:** if your investment adviser representative leaves Advisory Alpha, retires, or sells his/her practice; under these circumstances we permit the representative to retain your contact and account information in order to continue providing services to you

Yes

Yes, by contacting Advisory Alpha's compliance team at the number below.

#### Questions?

Call us Toll Free: 866-530-1400 and ask for the Compliance Team. You may visit our office at 348 S. Waverly Rd., Suite 100, Holland, MI 49423.

**Who we are****Who is providing this notice?**

Advisory Alpha, LLC, a registered investment adviser.

**What we do****How does Advisory Alpha, LLC protect my personal information?**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards as well as secured files and buildings.

We restrict access to your non-public personal information to those who need to know that information in order to service your account.

To protect you from "phishing" and other fraudulent activities, we will never request that you provide personal information to us via unsolicited e-mails, text messages or pop-up windows.

**How does Advisory Alpha, LLC collect my personal information?**

We collect your personal information, for example, when you

- Sign an investment advisory agreement with us
- Provide financial information on suitability forms to us so that we can provide our advisory services

We may also receive information about you from your accountants, lawyers, or tax preparers in regards to your investments.

**Why can't I limit all sharing?**

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- 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.

**Definitions****Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Insurance Planning Specialists, LLC
- Clear Creek Insurance, LLC
- Clear Creek Wealth Management, LLC

**Nonaffiliates**

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- Non-affiliates we share with can include financial service providers that assist us in servicing your accounts, such as securities broker-dealers, custodians and nonfinancial companies, such as service providers that assist us with portfolio management and accounting, mailing statements; and others, such as your Investment Adviser Representative's new investment adviser firm if your investment adviser representative chooses to leave Advisory Alpha, other investment adviser firms if designated by your Investment Adviser Rep if he or she leaves Advisory Alpha, retires, or sells his or her practice, joint account holders, Trusted Contacts and those with whom you have consented to our sharing your information.

**Joint Marketing**

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- We have no joint marketing arrangements.

**Other important information**

Please refer to the Part 2A of Form ADV Firm Brochure you received for additional information about Advisory Alpha, LLC. If you have questions or concerns, please don't hesitate to contact us.