

Item 1 – Cover Page



FORM ADV PART 2A

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407-567-0095

January 22, 2024

This Brochure provides information about the qualifications and business practices of Archway Private Wealth LLC, “Archway”. If you have any questions about the contents of this Brochure, please contact us at 407-567-0095. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Archway Private Wealth LLC is registered as an Investment Adviser with the U.S. Securities and Exchange Commission. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Archway is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the firm’s identification number 288578.

Item 2 – Material Changes

Since the last annual filing of this Form ADV Part 2A for Archway, dated February 17, 2023, there have been no material changes.

In the future, any material changes during the year will be reported here.

Pursuant to SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our fiscal year, which is December 31st. We may further provide other ongoing disclosure information about material changes as necessary.

Additionally, we will further provide you with a new brochure as necessary based on change or new information, at any time, without charge.

Our brochure may be requested free of charge by contacting Edward Harris at 407-567-0095 or info@archwayprivatewealth.us. Additional information about Archway is also available via the SEC's website www.adviserinfo.sec.gov.

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Item 4 – Advisory Business

Archway Private Wealth LLC (hereinafter referred to as “Archway”) is registered as an Investment Advisor with the U.S. Securities and Exchange Commission.

It was founded in September 2017 by the current CEO, Edward Harris.

As an investment adviser, we are a fiduciary to our advisory clients. As fiduciaries, we are expected to act and provide advice in the best interests of clients; have a duty to be loyal to our clients; make full and fair disclosure of all material conflicts of interest; seek best execution for client transactions; ensure that investment advice is suitable for clients' objectives, needs and circumstances; have a duty to have a reasonable, independent basis for investment advice; and refrain from effecting personal securities transactions that are inconsistent with client interests. If your account is a retirement account and subject to the Employee Retirement Income Security Act of 1974, we are also a fiduciary within Section 3(21) under the Employee Retirement Income Security Act of 1974 (ERISA), as amended. As ERISA fiduciaries, we are expected to provide advice that is in your best interest; only charge fees that are reasonable; and not make any materially misleading statements about recommended transactions, fees and compensation, conflicts of interest, or any other matters relevant to your investment decisions.

Strategic Relationship with Holborn Assets

In December 2020, Archway entered into a strategic relationship with Holborn Assets International (hereinafter “Holborn Assets”). Holborn Assets and its associated businesses operate outside the USA as financial advisors.

As part of this relationship, certain employees of Holborn Assets, as independent contractors of Archway act as Investment Advisory Representatives (hereinafter “IARs”) to offer the advisory services and programs described within this brochure. Holborn Assets and its associated businesses have their own businesses and offices through which they conduct not only advisory business but also provide other financial services. They market a variety of financial related services including but not limited to investment, property, and insurance services not offered by Archway through their independent businesses. These other businesses are separate from and not affiliated with Archway. The IARs and Holborn Assets have a direct interest in the fee charged to you since Archway will pay a portion of the advisory fee charged to you to Holborn Assets. It is important to refer to the Item 5 – Fees and Compensation below. Our IARs cannot exceed the fee disclosed under Item 5 below. However, the negotiability and the fee that you will pay for advisory services is determined between you and your IAR.

Archway offers the following advisory services. Each of the services is more fully described below.

- Consulting and Investment Advice for United Kingdom based Pension Assets
- Investment Management Services
- IRA Rollover Considerations

Consulting and Investment Advice for United Kingdom based Pension Assets

We provide pension consulting and investment advice to United Kingdom (“UK”) expatriates or other nationals who have existing UK-based pension plans. Our services include a review of each client's existing UK pension assets. The review can include a summary of the particular retirement and death benefits available to the client under existing UK pension plan(s) and, where applicable, the recent investment performance of the pension assets. The review will also include, where appropriate, options with regard to the future management of such pension assets and the selection of investment managers. The review process can also include an assessment of the client's goals, financial and lifestyle situation, and individual risk tolerance. Our services also include notifying clients from time to time of significant changes in UK pension legislation that could impact their pension assets and providing ongoing advisory services, as requested.

Following receipt of a client authorization form, we will request a statement of benefit from the client's existing

UK pension plan administrators or trustees. Once obtained, we will generally deliver to the client a written assessment of the client's UK pension assets based upon the statement of benefits received. Our services extend to those pension plans available to UK expatriates for their existing UK pension assets. These can include a Self-Invested Personal Pension ("SIPP"), a Qualifying Recognized Overseas Pension Scheme ("QROPS"), and/or other applicable plans. By assisting clients with the management of pension assets the firm aims to provide clients with greater control of their UK pension assets.

If suitable and in the client's best interests, and where required, Archway will assist with a transfer of pension assets to a Self-Invested Personal Pension ("SIPP"), a Qualifying Recognized Overseas Pension Scheme ("QROPS"), and/or other applicable plans. Where the client has a Defined Benefit/Final Salary pension with a transfer value in excess of £30,000, the transfer advice will only be given by an FCA regulated advisor with the relevant permissions for the transfer of Safe Guarded Benefits.

All pension assets are held by a regulated pension trustee (authorized by the relevant financial services regulator where the pension plan is held) and subject to the terms and conditions of a separate agreement between the client and the pension trustee. Such trustees include: Sovereign Group, and Forthcapital. A separate Custodian may then be utilized to hold the assets so that they can be invested. The Custodian may be a life insurance company (e.g. RL360, Hansard), a fund platform (e.g. Novia Global, Interactive Brokers), or directly with a custodian bank (BNY Mellon Pershing) as part of an Investment Management agreement. Unless specifically required by a client, pension assets are typically managed by a discretionary fund manager such as Tilney, subject to the terms and conditions of a separate management agreement between the client's pension trustee and the investment manager. Archway will provide continuous and ongoing support and updates on the UK pension landscape and administrative support with the client's policy and will at all times work in the client's best interest. Clients are strongly encouraged to review the agreement between the client and the pension trustee and other disclosure materials (like Key Features documents) provided by the pension trustee and the investment manager for a full understanding of the services provided and any associated costs therein.

Pension plan statements and other reports are generally sent directly to clients on an annual basis (unless requested more frequently) by the selected pension trustee, the custodian of record, and/or others similarly involved with the client pension plan. Clients are encouraged to review such material carefully for a complete understanding of the services offered and the costs associated with the management of such pension plans. Questions regarding our firm, its services/fees and other associated issues may be addressed with firm personnel directly.

Archway does not provide tax advice including, without limitation, in relation to any US tax reporting requirements and/or other tax implications arising in relation to clients' pension transfers. Archway recommends that clients seek their own tax advice, including in relation to procedures under tax treaties between the United States and the UK (or other applicable jurisdiction) for the avoidance of double taxation on their UK/EU pension arrangements.

Investment Management Services

Archway believes that clients' interests are best served by utilizing dedicated unaffiliated third-party investment management companies to provide investment management services.

Through personal discussions with clients and a formal data gathering process, Archway develops a broad understanding of goals and objectives based on a client's particular circumstances. This will include items such as time horizons, risk tolerance, liquidity needs, currency exposure, and ESG preferences. We may also review and discuss a client's prior investment history, as well as family composition and background. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

Unless otherwise expressly requested by you, your portfolio will be managed on a discretionary basis and changes to the allocation and the securities holdings will be made from time to time, without prior consultation with you.

By execution of the Archway Private Wealth LLC Client Advisory Agreement, you will grant discretionary authorization to Archway and your IAR to manage your account including the selection of a third-party investment manager. In addition, the client will authorize the custodian to follow our instructions as well as instructions given by the third-party investment manager to effect transactions, deliver securities, deduct fees and take other actions with respect to the client account. For additional information about discretionary authorization, please refer to Item 16 – Investment Discretion below.

It is important you read the Disclosure Brochure to the Third-Party Service Providers prior to entering into any agreement to use a Third-Party Service Provider. The Disclosure Brochure contains important information about the fees, services, and conflicts of interests associated with the program and the Third-Party Service Provider.

Archway primarily selects Asset Managers who use managed models consisting of individual securities (stocks and bonds), exchange traded funds and open-ended mutual funds and no-load and load waived mutual funds using institutional shares or when in the best interest of the client mutual funds purchased at net asset value (NAV). However, accounts are not exclusively limited to the aforementioned types of securities and include other securities such as variable products, alternative investments, options, and other securities deemed suitable for your portfolio.

As detailed in Item 5 below, Archway and Holborn Assets do not receive any compensation directly or indirectly from any of our selected Asset Managers.

If you elect to have your accounts managed on a nondiscretionary basis, you will be solely responsible for the allocation of investments within your account. No changes will be made to the allocation of your account without prior expressed instruction from you. You will assume all risks by electing to have your account managed on a non-discretionary basis. These risks include that your IAR will not be able to help you conduct transactions in a timely manner and that the execution of the trades by your Custodian do not happen in a timely manner. If you have your accounts managed on a nondiscretionary basis, your IAR cannot make changes to the allocations in your account without prior express instruction. With accounts managed on a nondiscretionary basis, there is an inherent risk your IAR will not be able to assist you in a timely manner in volatile markets. Your IAR will not be able to assist you to mitigate the effects of sharp market declines in an efficient manner without your expressed permission.

IRA Rollover Considerations

As part of our consulting and advisory services, we may offer you recommendations and advice concerning your employer retirement plan or other qualified retirement account. Our recommendations can include you consider withdrawing the assets from your employer's retirement plan or other qualified retirement account and roll the assets over to an individual retirement account ("IRA"). Further, we offer our Third Party Investment Manager's services for those funds and securities rolled into an IRA or other account. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as described above under Item 5. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation. You are under no obligation, contractually or otherwise, to complete the rollover. Furthermore, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by us.

It is important for you to understand many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of each.

An employee will typically have four options:

- Leave the funds in your employer's (former employer's) plan.

- Move the funds to a new employer's retirement plan.
- Cash out and taking a taxable distribution from the plan.
- Roll the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney. If you are considering rolling over your retirement funds to an IRA for us to manage it is important you understand the following:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
 - a. Employer retirement plans generally have a more limited investment menu than IRAs.
 - b. Employer retirement plans often have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
 - a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
 - b. You should understand the various products and services you might take advantage of at an IRA provider and the costs of those products and services.
 - c. It is likely you will not be charged a management fee and will not receive ongoing asset management services unless you elect to have such services. In the event your plan offers asset management or model management, there may be a fee associated with the services that is more or less than our asset management fee.
3. Our strategy can have higher risk than the option(s) provided to you in your plan.
4. Your current plan may offer financial advice, guidance, and/or model management or portfolio options at no additional cost.
5. If you keep your assets titled in a 401k or retirement account, you could delay your required minimum distribution beyond age 70.5 (70 ½).
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
 - a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies.
 - b. However, there can be some exceptions to the general rules so you should consult an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your IAR, or call our main number as listed on the cover page of this brochure.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon the client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

General Comments

Investment recommendations and advice offered by Archway are not legal advice or accounting advice. You

should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform Archway promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify Archway of any such changes could result in investment recommendations not meeting your needs.

Transactions in the account, account reallocations and rebalancing often trigger a taxable event.

Wrap Fee Programs

We do not participate in wrap fee programs.

Assets Under Management

As of December 31, 2023 Archway manages \$5,182,667 on a discretionary basis.

Item 5 – Fees and Compensation

General Disclosures

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

As stated under Item 4, Archway has a strategic relationship with Holborn Assets who have a group of independent contractors registered or licensed with Archway as IARs offering the advisory services and programs outlined in this Form ADV Part 2A. While no IAR can exceed the fees schedules outlined below, each IAR can negotiate and charge an advisory fee based on the fee schedules below.

Your IAR has a direct interest in the fee charged to you since Archway will pay a portion of the advisory fee charged to you to Holborn Assets who in turn will pay your IAR.

Consulting and Investment Advice for United Kingdom based Pension Assets

Clients will pay an initial fee covering time and services for planning, advice, consultation, and review and establishment of a Self-Invested Personal Pension ("SIPP") and Qualifying Recognized Overseas Pension Scheme ("QROPS"), and/or other applicable plans. The initial fee is deducted directly from the value of the assets transferred, unless paid by the client separately and directly to the SIPP Trustee, or by financing the fee from a life insurance bond wrapper.

The flat fee covers, among other things: Archway, Holborn Assets and the IAR working with the U.K. pension company to obtain the U.K. pension plan valuation; meetings with client to discuss potential pension transfer options; working with the U.K. regulated adviser where necessary; and, if in the best interests of the client, and assisting Client on the final steps to transfer the pension to the SIPP.

UK pension transfers with safeguarded benefits in excess of £30,000 are subject to review by a UK regulated adviser which will analyze whether a UK pension transfer is in the best interests of the client. The UK advisor will provide the transfer advice in these situations. Therefore, in addition to the initial fee, the client may be required to pay a fee to a UK registered Advisor to prepare the UK Suitability Report, which can be up to \$5,000 per pension, depending on the UK Advisor and the number of UK pension assets. The fee is paid direct to the UK Advisor for the report and is not determined or set by Archway or shared with Archway or its advisory representatives.

There are only a small number of UK regulated advisors able and willing to generate UK Suitability Reports for US Persons. At its discretion, Archway and Holborn Assets may choose a related party to write the report.

Notwithstanding this potential conflict of interest, the UK Advisor will always be regulated by the FCA in the UK and paid on a non-contingent basis, meaning they have no financial incentive to provide advice either for or against transfer.

When the UK Suitability Report is requested or required the Report Fee is paid upfront by the Client to Archway. At the discretion of the IAR, Archway and the Client may agree that Archway pay this fee in advance and have it rebated to them from the transferred pension funds by the pension trustee, should a transfer go ahead. If a transfer is not made, Archway will invoice the client for the Report Fee.

Depending on the type of Custodian chosen by the client to hold the pension assets for investment, there may be a fee from the Custodian of between 0% and 1% pa.

After pension assets are transferred, clients will pay an ongoing annual fee to Archway for monitoring, advice, consultation, and management of assets. Fees are negotiable and will be determined based on several factors including size of the pension assets, services being provided to the client, complexity of the situation, and consultations.

Initial Fee:

- Maximum fee not to exceed 5% of the pension assets transferred.
- The initial fee will be paid upon the transfer of assets and funds to a SIPP.
- The fee will be received by Archway in one of 3 ways, depending on the choice of custodian:
 - Direct custody with bank e.g. BNY Mellon Pershing/Tilney – in this situation the pension Trustee will deduct the fee from the transferred pension and transmit it to Archway
 - Custody via a fund platform e.g. Novia Global, Interactive Brokers – in the situation either the pension Trustee will deduct and remit the fee as above, or the fund platform provider will fulfill this function
 - Custody via a life insurance bond wrapper e.g. RL360, Hansard – in this scenario following receipt of the pension money and issuance of the policy, the life insurance company will pay a fee to Archway via Holborn Assets. The commission will be equal to the initial fee. Depending on the choice of the client, the life insurance company may either deduct the commission from the received pension funds, or finance this fee over a number of years agreed with the client. There is a tradeoff of having the full amount of the transferred pension assets invested, against the costs of financing the insurance bond, the additional costs of the insurance bond over and above the fee paid to Archway, and the added complexity of holding the investment assets in a life insurance wrapper. It is important for clients to understand financing the initial fee will increase the total costs of their pension. Should a client require access to their pension funds before the financing period has been completed, financial penalties will be imposed by the life insurance company. Archway does not share any of the insurance bond fees other than the amount paid as an initial fee as disclosed above and the ongoing advisory fees referenced below. A portion of the fee is assessed monthly or quarterly, in arrears, depending on the trustee.
- In the United States the Securities and Exchange Commission requires investment advisers to disclose that when fees exceed 3% the fees are considered excessive in comparison to fees charged by other investment advisers for similar services. Archway's maximum fee of 5% has been established based on other investment advisers offering similar services in the United States and the time and resources need for the initial evaluation and planning process.

Initial Fee based on value of transferred pensions	Maximum Initial Advisory Fee %
£0- £250,000	5.0%
£250,001- £1,000,000	4.5%
£1,000,000 +	4.0%

Custodian Fee:

- Direct Custody – e.g. RBC/LGT, or BNY Mellon/Pershing/Tilney = up to 0.25%
- Fund Platform – e.g. Novia Global, Interactive Brokers = up to 0.5% pa plus further quarterly and administrative fees
- Life Insurance bond – e.g. RL360, Hansard = up to 1.5% pa (inclusive of the financing charge for the payment of the Initial Fee as described above) plus further quarterly and administrative fees

Annual Fee:

- SIPP and QROPS accounts will be charged an annual fee not to exceed 1.50% annually. The annual fee will begin upon completion of the transfer.
- Depending on the SIPP or QROPS provider, fees will be deducted from the account on either a bill period of either: 1) calendar quarterly basis or 2) monthly basis in arrears.
- Fees will be calculated based on the value of the account on the last business day of the billing period (i.e. calendar quarter or monthly) and will be charged in arrears. Fees for partial billing periods will be prorated based on the number of days in the billing period.

Advisory fees will generally be collected directly from your account, provided you have given Archway written authorization. Written authorization is granted to Archway by execution of the client advisory agreement. You will be provided with an account statement reflecting the deduction of the advisory fee direct from the account custodian. If the Account does not contain sufficient funds to pay advisory fees, Archway has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees.

Discretionary Manager or Third-Party Asset Manager:

A discretionary manager (DM) or also referred to as third party asset manager can be engaged to manage some or a portion of the SIPP assets. The DM will charge a fee up to 0.75% on the portion of assets allocated to the DM. Therefore, annual asset management fees can be 2.25% (i.e. 1.50% maximum Archway fee plus 0.75% to the DM).

The annual fees are negotiable and are pro-rated and paid in arrears on a quarterly basis. The advisory fees are directly debited from client accounts, or the client may choose to pay by check. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Additionally, such advisory fees are not shared with Archway and are compensation to the fund- manager.

Additional Fees and Costs. In addition to the advisory fees above, you will pay transaction fees for securities transactions executed in your account in accordance with the custodian's transaction fee schedule. Additionally, you will pay fees for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the Account. Archway does not share in any portion of the aforementioned fees. The underlying investments in the SIPP will have internal costs that typically do not exceed 0.5%. This cost is borne by the investor and you will pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any exchange traded fund, mutual fund, or Undertakings for the Collective Investment in Transferable Securities (UCITS) purchased. Such fees are not charged by Archway and are charged by the product, broker/dealer, trustee, or account custodian. Archway does not share in any portion of such fees. Such advisory fees are not shared with Archway and are compensation to the underlying fund manager.

Additional Fees and Costs:

In addition to the fees outlined above, depending on the investment platform and SIPP/QROPS provider or

trustee, client is subject to the following fees and costs:

- Transaction fees
- Establishment or set-up fee and annual fees charged by the SIPP provider, these are typically around £500 per annum but will be detailed in a client's individual advice letter.
- Income or benefit set-up and annual fees charged by the SIPP provider
- If a portfolio bond is utilized there will be set-up fees, ongoing administration fees, and dealing fees per trade
- Exit penalty fees associated with the bond that decline over a period (often over a 10 year period)
- If a fund platform such as Novia Global is used as custodian they will charge a other ongoing administration fees, and dealing fees per trade. Such fees are not shared with Archway and are compensation to the custodian. If mutual funds, exchange traded funds or other pooled investment vehicles are used, the client will pay a proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any fund purchased. Such advisory fees are not shared with Archway and are compensation to the fund- manager.

Total Ongoing Fees - summary

Account value	Advisory Fee	Custodian Fee	Investment Manager Fee	Total Fee
Up to \$500,000	1.5%	0-1%	0.75%	2.25-3.25%
\$500,000+	1.25%	0-1%	0.75%	2.00-3.00%

Fees will be determined and calculated based on the average daily balance of the account for the calendar quarter and are charged quarterly in arrears.

In addition to the advisory fees above, you will pay fees for transaction charges, custodial services, account maintenance fees, and other fees associated with maintaining the Account.

Termination Provisions.

You may terminate investment advisory services obtained from Archway, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with Archway. You will be responsible for any fees and charges incurred from third parties as a result of transferring and/or maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, you may terminate investment advisory services upon delivery to Archway and your Advisory Representative of your written notice to terminate.

If termination occurs prior to the initiation of the transfer of pension assets, clients will be responsible for time and third-party expenses incurred such as the FCA report which can cost up to \$5,000 per pension.

If review, advice, and/or analysis of Client's United Kingdom pension have been initiated, Client will not be entitled to a prorated refund of the initial fee. The initial fee covers Adviser's time and review of the pension assets and Client's financial situation.

Client will be responsible for and agrees to pay a prorated portion of the annual fee based upon the number of days in the quarter up to Adviser's receipt of Client's written notice to terminate (the "termination date").

Item 6 – Performance-Based Fees and Side-By-Side Management

This section is not applicable to Archway. Archway does not charge performance-based fees.

Item 7 – Types of Clients

Archway services are geared toward individuals both high net worth (i.e. clients with a net worth of \$1,000,000

exclusive of primary residence) and other than high net worth.

Furthermore, Archway offers tailored advisory services involving pension transfer services to US Persons as further described in Item 4 and Item 5 above.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

By default, Archway client assets are managed by third-party investment managers. If a client decides not to engage with Archway's recommended Investment Manager then they will assume all responsibility and risks for self-selecting and managing the securities in their account.

Please refer to the third-party service provider's Form ADV and associated disclosure documents for details on their investment strategies, methods of analysis and associated risks. The risks with utilizing third party managed programs include:

Market and economic risk

- The risk the third-party manager is not managing to the objective or managing based on the stated strategy.
- The risk the securities managed by the third-party manager will decline or fluctuate impacting the overall performance of the portfolio.
- The risk that the performance of the portfolio will be diminished by the fees of the third-party manager and expenses associated with the securities.

Tilney Asset Management (Guernsey) Limited manages assets in sterling and U.S. dollars. Assets are reported in U.S. dollars. The value of investments is affected by fluctuations in exchange rates. In addition, assets are primarily denominated in currencies other than the client account's functional currency. Clients are advised of the risk of loss arising from fluctuations in the exchange rates. Unique risk factors of a currency include national debt levels and trade deficits, domestic and foreign inflation rates, domestic and foreign interest rates, investment and trading activities of institutions and global or regional political, economic or financial events and situations.

Depending on the needs of the client, long term, short term and active trading strategies will be utilized. Factors that result in a change to a client's portfolio include but are not limited to, economic factors, management changes with the security, tax law changes, objective change, and news or press releases, and financial changes with the client.

Archway emphasizes that investment returns, particularly over shorter time periods, can be highly volatile and are dependent on a wide variety of factors. Thus, our investment management services are generally suitable only for long-term investment objectives or strategies, rather than for short-term trading purposes. Neither diversification nor asset allocation assure a profit or protect you against a loss, and there is no guarantee that your investment objectives will be achieved.

You are advised investing in securities involves risk of loss, including the loss of principal. Therefore, your participation in any of the management programs offered by Archway will require you to be prepared to bear the risk of loss and fluctuating performance.

Archway does not represent, warrant or imply that the services or methods of analysis used by Archway can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Archway will provide a better return than other investment strategies.

Archway primarily uses mutual funds, exchange traded funds, individual equities and fixed income securities, and third-party service providers. The following are some of the primary risks associated with the securities and strategies utilized. Please do not hesitate to contact us to discuss these risks and others in more detail.

Mutual Funds: Mutual fund fees are described in the fund's prospectus, which the custodian mails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the client's request at any time Archway will direct the client to the appropriate Web page to access the prospectus.

The risks with mutual funds include:

- **Manager Risk:** This is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
- **Market Risk:** This is the risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.
- **Industry Risk:** This is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
- **Inflation Risk:** This is the risk that the rate of price increases in the economy deteriorates the returns associated with the mutual fund.

Registered investment company securities such as mutual funds, and variable products offer the securities in various share classes. Different share classes are priced differently and have varying levels of internal costs and share classes other than institutional share classes will involve higher internal costs that over time will cost you more. Institutional share classes often have higher trading costs; however, the internal costs of the fund are lower. Over a period of time, share classes other than institutional shares will become more expensive if held in the account for a long period time. A client needs to consider the amount being invested and the length of anticipated holding to make a decision as to the share class most suitable to the client. Advisory Representatives will select the lowest share class funds available and appropriate to the situation. However, in selecting the lowest share class, trading costs are sometimes higher.

Selecting the lowest share class appropriate to the situation does not imply the lowest cost share class but means what the Advisory Representative deems lowest cost for the situation. Advisory Representatives consider the anticipated holding period, cost structure, and administrative and transaction costs associated with selecting a share class. However, there is no way to predict the future and there will be occasions where a holding is liquidated sooner or held longer resulting in higher costs to the client. Additional information about share classes can be found in an Investor Alert issued by the Securities and Exchange Commission at <https://www.investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-bulletin-mutual-fund-classes> and <https://www.investor.gov/additional-resources/news-alerts/alerts-bulletins/investor-bulletin-mutual-fund-classes>. Additionally, the SEC and FINRA provide investor information at www.sec.gov and www.finra.org.

Exchange Traded Funds (ETFs): ETFs are professionally managed pooled vehicles that invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. ETFs trade on an auctionable market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day. Also, since most ETFs only mirror a market index, such as the S&P 500, they won't outperform the index. While ETFs generally provide diversification, risks can be significantly increased for funds concentrated in a particular sector of the market, or that primarily invest in small cap or speculative companies, use leverage (i.e. borrow money) to a significant degree, or concentrate in a particular type of security rather than balancing the fund with different types of securities.

Individual Equities: The risks with stocks are prices fluctuate throughout the day. Stocks can drop in value and become worthless. The risks with stocks are market risk and company specific risk. The price of a stock can decline due to company-specific reasons as well as the health of the overall stock market. Even dividends, which many beginning investors believe are guaranteed payments by the company, can decline or be totally eliminated.

Investing in micro, small or mid- sized companies involve risks not associated with investing in more established companies.

Since equity securities of smaller companies do not always trade as often as equity securities of larger, more established companies, it is be difficult or impossible for the securities to sell.

Bonds: Investing in bonds involves the assumption of risk including:

- *Interest Rate Risk:* which is the risk that the value of the bond investments we recommend to you will fall if interest rates rise.
- *Call Risk:* which is the risk that your bond investment will be called or purchased back from you when conditions are favorable to the bond issuer and unfavorable to you.
- *Default Risk:* which is the risk that the bond issuer is unable to pay you the contractual interest or principal on the bond in a timely manner or at all.
- *Inflation Risk:* which is the risk that the rate of price increases in the economy deteriorates the returns associated with the bond.

Alternative Products (*real estate investment trusts, special purpose vehicles, private placements*): Investing in alternative and private placement investments involves unique and serious risks an investor must be prepared to bear. **It is crucial an investor reads the offering memorandum prior to investing for full disclosure of qualification requirements and risks including:**

- Operational, economic, market cycles and trends, investment, tax
- Risk of hedge funds, derivatives, and other investment vehicles
- Trading risks such as short selling, performance based fees, limited operating and investment experience, consulting fees, interest and lending fees
- Use of leverage
- Illiquidity or limited liquidity
- Non-existence of or minimal secondary market Valuation complexities and limitations of valuations
- High degree of risk and potential loss of principal

Risks: The business of investing in securities is highly competitive and the identification of attractive investment opportunities is difficult and involves a high degree of uncertainty. Varied fluctuations in the price of investments are a normal characteristic of securities markets due to a variety of influences. Managed account programs should be considered a long-term investment and thus long-term performance and performance consistency are the major goals.

Tax Risk: Income tax costs result from the sale of individual securities within your account, unless the account is otherwise tax sheltered or tax deferred. Income tax costs directly reduce investment returns. Under the current income tax system, securities held less than one year that are sold at a gain (short term capital gains) are taxed at the client's highest marginal tax rate, and securities held greater than one year that are sold at a gain (long term capital gains) are taxed at a reduced long-term capital gains rate. Furthermore, the Alternative Minimum Tax (AMT) impact of long and short-term capital gains incurred in the tax year in question should be considered. Client is responsible for all tax liabilities arising from the sale of securities within the account.

International investing presents certain risks not associated with investing solely in the United States. These include, for instance, risks relating to fluctuations in the value of the U.S. dollar relative to the values of other currencies, custody arrangements made for foreign holdings, political risks, differences in accounting procedures and the lesser degree of public information required to be provided by non- U.S. companies.

Investing in emerging markets involves greater risk than investing in more established markets. Such risks include exchange rate changes, political and economic upheaval, the relative lack of information about these companies, relatively low market liquidity, and the lack of strict financial and accounting controls and standards.

Investing in fixed income securities involves special risks not typically associated with equity securities. These risks include credit risk, which is the risk of loss due to the inability to meet contractual debt obligations, and interest rate risk, which is the risk that an investment's value will change due to a change in the level of interest rates. Additionally, there is an inverse relationship between bond prices and interest rates specific to fixed income securities. As interest rates rise, bond prices fall and, conversely, as interest rates fall, bond prices rise.

Long-term purchases – Using a long-term purchase strategy generally assumes the Financial Markets will go up in the long-term which is not always the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall Financial Markets advance. Purchasing investments long-term creates an opportunity cost - “locking-up” assets that is better utilized in the short-term in other investments.

Active Trading – frequent trading of securities; explain how frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes

Fundamental Analysis does not attempt to anticipate market movements. This represents a risk, as the price of a security can move up or down along with the overall market, regardless of the economic and financial factors considered in evaluating the security. The success of this strategy depends in large part on the ability to accurately assess the fundamental value of securities. An accurate assessment of fundamental value depends on a complex analysis of a number of financial and legal factors. No assurance can be given that we can assess the nature and magnitude of all material factors having a bearing on the value of securities.

Quantitative Analysis: The risk of the analysis using mathematical and statistical modeling is that they are not accurately predict future investment patterns. Day to day changes in the market prices of investments follow random patterns and are not predictable with any reliable degree of accuracy.

Qualitative Analysis: The risk of analysis using more subjective criteria is that the information obtained to make the analysis is inaccurate and skews the analysis. In addition, measuring (or weighting) the criteria will likely be inconsistent from one analysis to another and could adversely affects the investment decisions.

No investment strategy can avoid loss. Investing in securities involves risk of loss that you need to be prepared to bear.

Item 9: Disciplinary Information

Criminal or Civil Actions

Archway and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Archway and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Archway and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of Archway or the integrity of its management

Item 10: Other Financial Industry Activities and Affiliations

No Archway employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No Archway employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Recommendations or Selections of Other Investment Advisers

As stated under Item 4, *Advisory Business* above, Archway recommends other investment advisers (i.e. discretionary managers, third-party managers, and third-party service providers). Archway and your advisory representative do not share in the advisory fees you pay to the third-party service providers. Fees paid to third-party service providers is separate from the fees paid to Archway. Archway's and your advisory representative's fee are in addition to the third-party manager fee.

Non-US based advisors / Holborn Assets strategic relationship

As previously disclosed in this document, Archway has a strategic relationship with Holborn Assets, through which employees of Holborn Assets become registered as IARs of Archway in order to provide advisory services to US Persons.

These IARs may have qualifications and association through other internationally licensed firms to offer securities and insurance products to clients outside the United States and receive compensation. Archway is not affiliated with the non-U.S. based licensed firms and does not participate in any compensation. Furthermore, Archway does not oversee or supervise activities of non-U.S. based advisory representatives conducting business outside the U.S. through the non-U.S. based licensed companies.

The owner of Archway Private Wealth Ltd is a related party to the owners and principals of Holborn Assets.

Archway attempts to mitigate the conflicts of interest with the receipt of commissions if recommendations are implemented by providing you with these disclosures.

Further, you are encouraged to consult other professionals and implement recommendations through other financial professionals.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings.

Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect credit of the profession.

- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its “related persons” may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. Our policy is designed to assure that the personal securities transactions, activities and interests of the employees of our firm will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates’ transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

Trading Securities At/Around the Same Time as Client’s Securities

From time to time, our firm or its “related persons” may buy or sell securities for themselves at or around the same time as clients. We will not trade non-mutual fund securities prior to the same security for clients on the same day.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Archway does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

Research and Other Soft-Dollar Benefits

We currently do not receive soft dollar benefits.

Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker- dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice where regulations permit. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients’ money over using a lower-cost custodian.

The Custodian and Brokers We Use

Archway does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw advisory fees from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer, bank, or life insurance company.

Aggregating (Block) Trading for Multiple Client Accounts

Outside Managers used by Archway may block client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

Investment advisers may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. In the event Archway is executing a trade on behalf of a client, we do not engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy is to implement all client orders on an individual basis. Therefore, we do not aggregate or “block” client transactions. Considering the types of investments we hold in advisory client accounts, and that trades conducted by Archway are typically in response to a specific client request, we do not believe clients are hindered in any way because we trade accounts individually.

Item 13: Review of Account

Clients with the UK Pension assets

These subject to an initial review by the IAR and supervised by the CEO. Subsequent reviews will be conducted by the IAR prior to and upon clients reaching certain designated ages. More frequent review may be implemented where there has been a market downturn, where certain laws and regulations regarding pensions have changed and where clients have notified the firm of a change to their financial status or risk tolerance. Clients are strongly encouraged to notify the firm of any changes to their financial wellbeing, any change that may impact the status of their financial objectives, and/or any relocation back to the UK.

Client accounts with the Investment Management Service

These will be reviewed regularly on an annual basis by the IAR. The account is reviewed with regards to the client’s investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will be provided written reports on a quarterly basis directly from the account custodian. Additionally, you will receive confirmations of all transactions occurring direct from the account custodian.

Item 14: Client Referrals and Other Compensation

Archway has entered into a solicitor agreement with Holborn Assets to refer United Kingdom (“UK”) expatriates or other nationals generally residing in the United States who have UK based pension plans and want to transfer to a SIPP or QROPs. A description of this service is provided in Item 4 and Item 5 above. A portion of the advisory fee paid by clients to Archway for transferring and managing their SIPP or QROPs will be paid to Holborn Assets. Clients will be provided with a Solicitor Disclosure Statement as part of the Client Agreement to explain the arrangement and the payment of the fee. Clients will not be charged a higher fee as a result of payment of the solicitor fee.

As stated under Item 4 above, through its strategic relationship with Holborn Assets, Archway has a number of IARs that act as independent contractors and are in fact employed by Holborn Assets. As such, these IARs have a direct incentive in the advisory fees being charged since a portion of the advisory fee collected by Archway will be paid to Holborn Assets and ultimately to the IAR for compensation for advisory services. In other words, these IARs are not salaried, but instead, share in the fees charged to you by Archway. Clients are advised that the amount paid by Archway to Holborn Assets will be directly proportional to the amount of fees received from its clients. Therefore, the higher sales the IAR produces, the more compensation the IAR will receive. Since a portion of the advisory fees will be retained by IAR, there is a conflict of interest for the IAR to charge the maximum fee as disclosed under Item 5 above.

The client will be advised of the fees being paid to the solicitor or introducer and the client is given the opportunity to agree and authorize the payment of the fee by execution of the Introducer’s Disclosure Statement. There

is a conflict of interest for the client's non-U.S. advisor to refer clients to Archway to manage their U.S. based assets because of the non-U.S. advisor's receipt of a portion of the Archway advisory representative's fee.

To mitigate these conflicts of interest, this disclosure and the Introducer's Disclosure Statement is provided. However, payment of these fees to Holborn Assets does not increase the costs for the clients as the total fees charged for clients coming direct to Archway will be charged fees broadly in line with the market costs charged by Holborn Assets via the relationship with Archway. The strategic relationship merely seeks to share the similar revenues in line with where the economic activity is taking place.

Item 15: Custody

Archway does not take custody of your funds or securities, except that under government regulations:

- Archway will be deemed to have custody in certain situations involving standing letters of authorization and if you give us authority to transfers funds or securities between your accounts.
- Archway will be deemed to have custody with the deduction of Archway's advisory fees from your accounts.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures.

Item 16: Investment Discretion

Unless you specifically elect to have your account managed on a non-discretionary basis, for those client accounts where we provide investment management services, we maintain discretion over client accounts with respect to securities to be bought and sold, the amount of securities to be bought and sold, and the Third-Party Service Providers on your account.

Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will grant such authority by execution of the client advisory agreement. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Archway will not have authority to remove or transfer funds or assets out of your account without your authorization with the exception of deduction of advisory fees from your account.

Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet

contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$1,200.00 in fees per client six months in advance.

Archway Private Wealth LLC Privacy Notice

Rev. Dec 2020

FACTS

WHAT DOES ARCHWAY PRIVATE WEALTH LLC DO WITH YOUR PERSONAL INFORMATION?

Why?

Registered Investment Advisers choose how they share your personal information. Federal law gives clients 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:

- Information you provide in the subscription documents and other forms (including name, address, social security number, date of birth, income and other financial-related information); and
- Data about your transactions with us (such as the types of investments you have made and your account status).

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 Archway Private Wealth LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information

For our everyday business purposes—to process your transactions, maintain your accounts (for example we may share with our third-party service providers that perform services on our behalf or on your behalf, such as accountants, attorneys, consultants, clearing and custodial firms, and technology companies, respond to court orders and legal investigations, or report to credit bureaus.

For Marketing purposes—to offer our products and services to you

How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and

Our employees are advised about Archway Private Wealth's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.

We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements.

Other important information

We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our Privacy Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.