Effective: March 27, 2026

Our Commitment to You

Gunpowder Capital Management, LLC dba Oliver Wealth Management ("Oliver Wealth" or the "Advisor") is committed to safeguarding the use of personal information that we obtain from our Clients (also referred to as "you" and "your") as your Investment Advisor, as described herein our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Oliver Wealth (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that suck information is used for proper business purposes in connection with the management of servicing of our relationship with you.

Oliver Wealth does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the service and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in the Policy.

Why do you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information to properly manage and service your account with us. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver's license	Date of Birth
Social Security or Tax Identification number	Assets and liabilities
Name, address, and phone number*	Income and expenses
E-mail address(es)	Investment activity
Account Information (including other institutions)	Investment experience and goals

*We may collect your phone number to send you SMS messages related to our services, including updates, reminders, and customer support.

How do we collect your personal information?

Custody, brokerage, and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural, and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and secure office environment. Our technology vendors provide security and access control over personal information and have their own policies on the transmission of data. We also maintain our own policies and procedures which specifically address the protection and proper handling of a Client's personal information. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some circumstances in which we may share your personal information and if you can limit us from sharing.

Basis for Sharing	Do we share?	Can you limit?
For our everyday business purposes-such as processing your transactions, maintaining your account(s), responding to court orders and legal investigations, or reporting to credit bureaus.	Yes	
Our Marketing Purposes- to offer products and services to you.	Yes	
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes- information about your creditworthiness.	No	No
For our affiliates' everyday business purposes- information about your transactions and experiences	No	We do not share
For our affiliates to market to you	No	We do not share
For our nonaffiliates to market to you	No	We do not share

*We do not share, sell, or rent your phone number or SMS consent to third parties for marketing purposes. Your information is used only to provide our services and comply with applicable regulations.

How do I limit sharing?

Call: (410) 343-7125 or Email: ntm@oliverwealth.com

If you’re a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this 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 information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (410) 343-7125.