



Privacy Notice

Pursuant to SEC Regulation S-P (as amended May 2024)

INTELLICAPITAL ADVISORS, LLC · EFFECTIVE AUGUST 3, 2026

FACTS *What does Intellicapital Advisors, LLC do with your personal information?*

W H Y	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.
W H A T	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 balances and payment history; credit history and credit scores; bank account and routing numbers; transaction history from linked financial accounts; and investment objectives, risk tolerance, and financial planning data.
H O W	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 we choose to share, and whether you can limit this sharing.

How We Share

Reasons we share and what you can limit

All financial companies need to share customers' personal information to run their everyday business. The table below lists the reasons we can share your personal information, the reasons we choose to share, and whether you can limit our sharing.

REASONS WE CAN SHARE YOUR PERSONAL INFORMATION	DO WE SHARE?	CAN YOU LIMIT?
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
For our marketing purposes — to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	N/A
For our affiliates' everyday business purposes —	Yes	Yes

information about your transactions and experiences		
For our affiliates' everyday business purposes — information about your creditworthiness	No	N/A
For our affiliates to market to you	No	N/A
For non-affiliates to market to you	No	N/A
For processing by third-party service providers (custodians, technology vendors, compliance partners) operating under written confidentiality agreements	Yes	No

To limit our sharing: Call (866) 438-1958, email bafa@intellicapital.com, or mail the opt-out form at the end of this notice.

· Who We Are ·

Who is providing this notice?

Intellicapital Advisors, LLC (“IAL”), an SEC-registered investment adviser (CRD# 316908, SEC File# 801-135277) headquartered in Ponte Vedra Beach, Florida. IAL provides comprehensive wealth management services including financial planning, investment advisory, tax coordination, and estate planning facilitation to individuals and families.

· What We Do ·

How does IAL protect my personal information?

To protect your personal information from unauthorized access and use, we maintain a comprehensive information security program that complies with federal law, including the amended requirements of SEC Regulation S-P (effective June 3, 2026 for smaller entities). Our safeguards include: encryption of sensitive client data at rest and in transit (TLS 1.2+, AES-256); multi-factor authentication required for all personnel and client portal access; role-based access controls; continuous monitoring and audit logging; PII-redacting logging systems; annual risk assessments and penetration testing; and employee security awareness training.

Incident response & breach notification

IAL maintains a written Incident Response Plan that is reasonably designed to detect, respond to, and recover from any unauthorized access to or use of customer information. If we become aware of an incident involving unauthorized access to or use of your sensitive customer information, we will notify you as soon as practicable, and no later than 30 days after becoming aware of the incident.

Service provider oversight

IAL maintains written policies and procedures for the oversight of service providers that receive, maintain, or otherwise are permitted access to customer information. Service providers are contractually required to notify IAL within 72 hours of becoming aware of a breach involving customer information. Our key service providers currently include Charles Schwab and Fidelity Investments (custodians); Adhesion Wealth and AssetMark (asset management platforms); DPL Financial Partners and RetireOne (annuity networks); Black Diamond (performance reporting); Wealthbox (client

relationship management); Pontera (held-away account management); eMoney Advisor (financial planning); Nitrogen Wealth (risk assessment); Wealth.com (estate document facilitation); Plaid (bank data aggregation); DocuSign (electronic signature and agreement execution); COMPLY (communications archiving and compliance systems); Visory (managed information technology and Microsoft 365 administration); and cloud infrastructure and email providers including Amazon Web Services, Supabase, Cloudflare, Vercel, Anthropic, and Resend.

Recordkeeping

IAL maintains records in accordance with SEC Rule 204-2 and the amended Regulation S-P requirements. Policies and procedures related to safeguarding customer information are retained for a minimum of 5 years. Client financial records and advisory documentation are retained for a minimum of 7 years per SEC Rule 204-2. Audit logs and access records are maintained with access controls and monitoring consistent with the Firm’s Information Security Policy (ISP v2.2).

· Definitions ·

Key terms used in this notice

Affiliates. Companies related by common ownership or control. IAL’s affiliates include BAFA Labs Incorporated and related entities under common ownership.

Non-affiliates. Companies not related by common ownership or control. IAL does not share with non-affiliates for marketing purposes.

Joint marketing. A formal agreement between nonaffiliated financial companies that together market financial products or services to you. IAL does not engage in joint marketing arrangements.

· Contact & Governance ·

Policy governance

POLICY OWNER	Michael McAlpin, CFP® — Founder, Managing Partner & Chief Compliance Officer
EFFECTIVE DATE	August 3, 2026
REVIEW FREQUENCY	Annually, or upon material regulatory or business change
NEXT SCHEDULED REVIEW	March 31, 2027
PHONE	(866) 438-1958
EMAIL	bafa@intellicapital.com
MAILING ADDRESS	4210 Valley Ridge Blvd, Suite 105, Ponte Vedra Beach, FL 32081

QUESTIONS

If you have questions about this Privacy Notice, the personal information we collect about you, or how to opt out of sharing where permitted, please contact Michael McAlpin, CFP®, Founder, Managing Partner & Chief Compliance Officer, at (866) 438-1958 or bafa@intellicapital.com.