

## Customer Relationship Summary

### January, 2025

Vauban Wealth Management is registered with the Securities and Exchange Commission as an Investment Adviser. It is important that you understand that brokerage and investment advisory services and fees differ. You may find free and simple tools to research firms and financial professionals at <https://www.investor.gov/CRS> which also provides educational materials about broker-dealers, investment advisers and investing.

#### What investment services and advice can you provide me?

VWM offers account management services to clients ("Clients") on either a discretionary basis, where the Client authorizes VWM to make all investment decisions for the account or on a non-discretionary basis, where VWM makes recommendations to the Client but all investment decisions are made by the Client and may or may not be implemented by the Client. All Client assets will be managed pursuant to the Client's selected investment strategy.

The investment strategies offered by VWM are as follows:

- |                       |   |
|-----------------------|---|
| a) Income:            | exclusively invested in fixed income securities                           |
| b) Conservative:      | predominantly invested in fixed income securities                         |
| c) Balanced:          | balanced allocation of fixed income securities and equities               |
| d) Dynamic Growth:    | predominantly invested in equities  |
| e) Aggressive Equity: | quasi exclusively invested in equities                                    |
| f) Alternative:       | A large part of the portfolio may be invested in alternative investments. |

#### When considering our services, ask our financial professional:

- Given my financial situation, should I choose an investment advisory service? Why or Why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

#### What fees will I pay?

VWM currently charges an annual advisory fee of 1.0% of assets under management ("Investment Advisory Fee"). All securities managed by VWM will be independently valued by the custodian. VWM will not have the authority or responsibility to value portfolio securities.

Apart from the personal Client service provided directly by VWM, services identical to VWM may be provided by other investment advisors for advisory fees that may be greater or less than the advisory fees charged by VWM. Additionally, Clients could invest in the same or similar products directly, without the services of VWM

Clients will incur certain fees or charges imposed by third-parties, other than VWM, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealers. Mutual funds and variable annuity sub-account fees and expenses are described in each fund's or sub account's prospectus. These fees will generally include a management fee, other expenses, and a possible distribution fee.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. The more assets are in the accounts for which we provide advisory services, the more you will pay in fees. Therefore, the firm may have an incentive to encourage you to increase the assets in your account.

**When considering our services, ask our financial professional:**

- **Given my financial situation, should I choose an investment advisory service? Why or Why not?**
- **How will you choose investments to recommend to me?**
- **What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?**

**What are your legal obligations to me when acting as my broker-dealer? How else does your firm make money and what conflicts of interest do you have?**

When we act as your Investment Adviser, we have to act in your best interest and not put our interest ahead of yours. **At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations and investment advice, we provide you. Here are some examples to help you understand what this means.**

Vauban Wealth Management is a wholly owned subsidiary of Laperouse, LTD. Laperouse LTD is also the owner of Vauban International Bank ("VIB"), a corporation doing business as an international financial entity under the laws of the Commonwealth of Puerto Rico, authorized to engage in international banking transactions, fiduciary activities, and other activities of a financial nature outside of Puerto Rico, which would be allowed to be done by a bank holding company or by a foreign office or subsidiary of a United States bank under applicable United States law. Under Puerto Rico law, Vauban Wealth Management generally recommends its affiliate, Vauban International Bank, VIB, as custodian for the assets of non-Puerto Rico Clients. This affiliation presents a conflict of interest; however, neither VWM, nor its advisors, will earn any additional compensation from VIB for this referral. In addition, Clients are not obligated to contract VIB as custodian to obtain VWM services. Although VWM recommend its non-Puerto Rico Clients to hold custody at VIB, Clients may choose to keep custody at another qualified financial institution.

**When considering our services, ask our financial professional:**

- **How might your conflicts of interest affect me, and how will you address them?**

**How do your financial professionals make money?**

Our investment advisers are paid a salary and may receive discretionary bonuses that may or may not be based on production. Nevertheless, the fact that the more assets in your account, the more fees you are charged, may give our advisors an incentive to encourage you to increase the assets in your account.

**Do you or your financial professionals have legal or disciplinary history?**

Visit [www.investor.gov/CRS](http://www.investor.gov/CRS) for a free and simple tool to research us and our financial professionals.

**When considering our services, ask our financial professional:**

**As a financial professional, do you have any disciplinary history? For what type of conduct?.**

#### **Additional Information**

At any time, you may view the current Customer Relationship Summary and our Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD #305222. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (787)425-0035, (787)425-0036 or [admin@vaubanwealth.online](mailto:admin@vaubanwealth.online).

## **Privacy Policy**

### **January 2025**

#### **Our Commitment to You**

Vauban Wealth Management (“VWM” or the Advisor) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in 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. VWM (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 such information is used for proper business purposes in connection with the management or servicing of our relationship with you. VWM 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 servicing 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 this Policy.

#### **Why you need to know?**

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. 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?**

Personal information that collect may include, but is no limited to:  
Driver’s license number, Date of birth, Social security or taxpayer identification number, Assets and liabilities , Name, address, phone number(s), Income and expenses, E-mail address(es), Investment activity, Account information (including other institutions), Investment experience and goals.

#### **What Information do we collect from other sources?**

VWM may collect information needed to service your account. The information we collect may include, but is no limited to: 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.

### 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 a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect 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?

We may need to share client personal information in order to effectively implement our services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> VWM does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where VWM or the client has a formal agreement with the financial institution. We will only	No	Not Shared

share information for purposes of servicing your accounts, not for marketing purposes.		
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> VWM does not disclose and does not intend to disclose, nonpublic personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

**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 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. **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 (787)425-0035, (787)425-0036.