

## **PRIVACY POLICY**

The Adviser is required to notify clients of its policies regarding the privacy of a client's personal information on an annual basis. The Adviser recognizes and appreciates the importance of respecting the privacy of its clients. The Adviser values the trust our customers place with us and is committed to safeguarding against the unauthorized use of, and access to, customer information. The following policies apply to current and former clients of the Adviser.

In order to conduct and process your business in an accurate and efficient manner, the Adviser must collect non-public personal information about its clients. The Adviser limits the collection of information to the minimum amount required to properly manage your account and to comply with certain legal requirements. The Adviser obtains the following non-public personal information about its clients:

- Information you provide directly or indirectly to the Adviser on account applications or other forms, correspondence and in conversations such as your name, address, telephone and facsimile numbers, email address, date of birth, social security or tax identification number, assets, income and investment objectives.
- Information related to your transactions with the Adviser, such as your account numbers, account balances, transaction details and other financial information.
- Information the Adviser receives from third parties, including brokers, consultants, custodians or financial planners, such as broker statements, custodial statements and trade confirmations.

In order to protect the privacy of its clients, the Adviser carefully controls the way in which any information is shared. The Adviser does not disclose any non-public personal information about its customers or former customers to any third party, except at the client's request or as permitted or required by law. The Adviser may disclose such non-public personal information to brokers or other agents that help the Adviser process your transactions or service your accounts. These entities may receive information about you, but they must safeguard this information and they may not use it for any other purposes.

The Adviser is committed to protecting the confidentiality of your personal information. The Adviser restricts access to authorized employees who are trained in the proper handling of client information. In addition, the Adviser maintains physical, electronic and procedural safeguards that meet applicable legal standards to protect your non-public personal information.