

PRIVACY POLICY

We are required to notify you of our policies regarding the privacy of your personal information on an annual basis. Schafer Cullen Capital Management / Cullen Capital Management, LLC (the “Adviser”) recognizes and appreciates the importance of respecting the privacy of our clients. We value the trust our customers place with us and we are 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, we must collect non-public personal information about you. We limit the collection of information to the minimum amount required to properly manage your account and to comply with certain legal requirements. We obtain the following non-public personal information about our clients:

- Information you provide directly or indirectly to us on account applications or other forms, correspondence and conversations such as your name, address, telephone and facsimile numbers, date of birth, social security number or tax identification, assets, income and investment objectives.
- Information related to your transactions with us such as your account numbers, account balances, transaction details and other financial information.
- Information we receive 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 our clients, we carefully control the way in which any information is shared. The Adviser does not disclose any non-public personal information about our customers or former customers to any third party, except at our client’s request or as permitted by law. The Adviser may disclose such non-public personal information to brokers or other agents that help us process your transactions or service your accounts.

The Adviser is committed to protecting the confidentiality of your personal information. We restrict 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.