



PRIVACY POLICY/REGULATION

Effective February 2024

The Company's views protecting private information regarding its clients and potential clients as a top priority.

Pursuant to the requirements of the Gramm-Leachy-Bliley Act (hereinafter "GLBA") and guidelines established by the Securities Exchange Commission regarding the Privacy of Consumer Financial Information (hereinafter "Regulation S-P"), the Company has instituted the following policies and procedures in an effort to ensure that such nonpublic private information is kept private and secure. This policy also outlines what the Company and its Associated Persons are allowed to use the confidential personal information collected in connection with its advisory activities.

Regulation S-P defines "consumer" as an individual who obtains or has obtained a financial product or service from a financial institution primarily for personal, family, or household purposes, or for that individual's legal representative.

"Customer" is defined as a consumer who has an on-going relationship with the institution. Generally, a customer is a consumer who has an investment advisory contract with the Company (whether written or oral) and/or the Company regularly effects or engages in securities transactions with or for a consumer even though the Company does not hold assets of the consumer.

While these terms have specific definitions, for the purposes of the Company's policies, both consumers and customers will be collectively referred to as "clients" (or "potential clients" or "former clients" where applicable).

This policy serves as formal documentation of the Company's ongoing commitment to the privacy of its clients. All Associated Persons will be expected to read, understand, and abide by this policy, as well as to follow all related procedures and to uphold the standards of privacy and security set forth by the Company. This Policy and the related procedures contained herein are designed to comply with applicable privacy laws, including the GLBA, and to protect nonpublic personal information of the Company's clients.

Scope of Policy

This Privacy Policy covers the practices of the Company and applies to all nonpublic personally identifiable information, including information contained in consumer reports, of our current and former clients.

Overview of the Guidelines for Protecting Client Information

In Regulation S-P, the SEC published guidelines, pursuant to Section 501(b) of the GLBA, that address the steps a financial institution should take in order to protect client information. The overall security standards that must be upheld are:

- Ensuring the security and confidentiality of client records and information
- Protecting against any anticipated threats or hazards to the security or integrity of client records and information
- Protecting against unauthorized access to or use of client records or information that could result in substantial harm or inconvenience to any client

Responsibility

1. Each Associated Person has a duty to protect the nonpublic personal information of clients collected by the Company.
2. Each Associated Person has a duty to ensure that nonpublic personal information of the Company's clients is shared only with Associated Persons and others in a way that is consistent with the Company's Privacy Notice and the procedures contained in this Policy.
3. No Associated Person is authorized to sell, on behalf of the Company or otherwise, nonpublic information of the Company's clients.
4. Associated Persons with questions concerning the collection and sharing of, or access to, nonpublic personal information of the Company's clients must look to the Company's CCO for guidance.
5. Violations of these policies and procedures will be addressed in a manner consistent with other Company disciplinary guidelines.

Information Practices

The Company limits the use, collection, and retention of client or potential client information to what we believe is necessary or useful to conduct our business or to offer quality products, services, and other opportunities that may be of interest to our clients or potential clients.

The Company collects nonpublic personal information about clients and/or potential clients from various sources. These sources and examples of types of information collected include:

- Product and service applications or other forms, such as client surveys, agreements, etc., which typically request name, address, telephone number, social security number or taxpayer ID number, date of birth, employment status, annual income, and net worth
- Information about transactions with the Company and account custodian(s), such as account balance, types of transactions, parties to the transactions, and investment history
- Information received from consumer reporting agencies, such as credit reports

Disclosure of Information to Nonaffiliated Third Parties – "Do Not Share" Policy

The Company has a "do not share" policy. We do not disclose nonpublic personal information to nonaffiliated third parties, except under one of the GLBA privacy exceptions, as described below. Since the Company currently operates under a "do not share" policy, it does not need to provide the right for its clients to opt out of sharing with nonaffiliated third parties, as long as such entities are exempted as described below. If our information sharing practices change in the future, we will implement opt out policies and procedures, and we will make appropriate disclosures to our clients.

Types of Permitted Disclosures – The Exceptions

In certain circumstances, Regulation S-P permits the Company to share nonpublic personal information about its clients with nonaffiliated third parties without providing an opportunity for those individuals to opt out. These circumstances include sharing information with a

nonaffiliate (a) as necessary to effect, administer, or enforce a transaction that a client requests or authorizes; (b) in connection with processing or servicing a financial product or a service a client authorizes; and (c) in connection with maintaining or servicing a client account with the Company.

Service Providers

From time to time, the Company may have relationships with nonaffiliated third parties (such as attorneys, auditors, accountants, brokers, custodians, and other consultants), who, in the ordinary course of providing their services to us, may require access to information containing nonpublic information. These third-party service providers are necessary for us to provide our investment advisory services. When we are not comfortable that service providers (e.g., attorneys, auditors, and other financial institutions) are already bound by duties of confidentiality, we require assurances from those service providers that they will maintain the confidentiality of nonpublic information they obtain from or through us. In addition, we select and retain service providers that we believe are capable of maintaining appropriate safeguards for nonpublic information, and we will require contractual agreements from our service providers that they will implement and maintain such safeguards.

Processing and Servicing Transactions

The Company may also share information when it is necessary to effect, administer, or enforce a transaction requested or authorized by clients. In this context, "necessary to effect, administer, or enforce a transaction" includes what is required or is a usual, appropriate, or acceptable method:

- To carry out the transaction or the product or service business of which the transaction is a part, and record, service, or maintain the client's account in the ordinary course of providing the financial service or financial product
- To administer or service benefits or claims relating to the transaction or the product or service of which it is a part
- To provide a confirmation, statement, or other record of the transaction, or information on the status or value of the financial service or financial product to the client or the client's agent or broker

Sharing as Permitted or Required by Law

The Company may disclose information to nonaffiliated third parties as required or allowed by law. For example, this may include disclosures in connection with a subpoena or similar legal process, a fraud investigation, recording of deeds of trust and mortgages in public records, an audit or examination, or the sale of an account to another financial institution.

By understanding how the Company shares data with its clients, their agents, service providers, parties related to transactions in the ordinary course of business, or joint marketers, the Company endeavors to ensure that client data is shared only within the exceptions noted above.

Disclosure of Information to Affiliated Third Parties

The Company may share information with affiliated parties and shall inform clients, in its privacy notice, of the type of information shared and the category of parties with whom such information is shared.

Privacy Notice

The Company has developed a Privacy Notice, as required under Regulation S-P. The notice discloses the Company's information collection and sharing practices and other required information. The notice will be revised as necessary any time information practices change. A copy of the Company's Privacy Notice is included in this manual as Appendix C.

Privacy Notice Delivery

Initial Privacy Notice - As regulations require, all new clients receive an initial Privacy Notice at the time the client relationship is established (i.e., upon execution of the agreement for services).

Annual Privacy Notice - regulations require that disclosure of the Privacy Policy be provided to existing clients on an annual basis.

Revised Privacy Notice

Regulation S-P requires that the Company amend its Privacy Policy and promptly distribute a revised disclosure to clients, if there is a change in the Company's collection, sharing, or security practices.

Joint Relationships

If two or more individuals jointly obtain a financial product or service from the Company, the Company may satisfy the initial, annual, and revised notice requirements by providing one notice to those individuals jointly.