

PRIVACY POLICY

May 2023

Federal law gives consumers the right to limit some, but not all, sharing of personal information. It 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.

TYPES OF NONPUBLIC PERSONAL INFORMATION ("NPI") WE COLLECT

We collect, use, disclose, and store personal data when needed to carry out our business activities as described in this Privacy Policy. This can include, but is not limited to, your: name, date of birth, social security number, contact details, personal email address, home address, passport and driver's license details, banking information, and financial account numbers. We collect personal data about individuals who use our website or who create accounts on our investment platform. When you are no longer our customer, we may continue to share your information as described in this notice.

PARTIES TO WHOM WE DISCLOSE INFORMATION

All investment advisers need to share personal information to run their everyday business. In the section below, we list the reasons that we may share your personal information:

- > In order to open your account(s), process your transactions, or maintain your account(s), we share information about your transactions and investment holdings with your investment advisor, custodian and exchanges
- > For ongoing operations, compliance and security purposes, we share your information with our consultants, accountants, or other service providers, such as technology vendors, that enable us to deliver our services
- > For joint marketing with other financial companies

We may begin sharing your information on the day you sign our agreement. When you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

PROTECTING CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use a variety of electronic and procedural safeguards aimed at protecting personal data and confidential information. We also limit access to personal data to authorized employees and service providers.

FEDERAL & STATE LAW ALLOWS YOU TO LIMIT SHARING - OPTING OUT

Federal law gives you the right to limit only the following:

- > Sharing for affiliates' everyday business purposes, information about your creditworthiness
- > Affiliates from using your information to market to you
- Sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately at the number or email listed below if you choose to opt out of these types of sharing.

DEFINITIONS: Affiliates are companies related by common ownership or control. Note, we do not have affiliates. Non-affiliates are companies not related by common ownership or control. Joint marketing is a formal agreement between non-affiliated financial companies that together market financial products or services to you.