

SIVIA CAPITAL

Our Continuing Privacy Commitment To You

Dear Client,

This Privacy Policy outlines our commitment to protect the confidentiality and security of your personal and financial information. We understand the sensitivity surrounding personal information and because of this our client privacy procedures are extremely strict.

The nonpublic personal information we collect about you is gathered through verbal, written and electronic means over the course of our relationship with you.

Sources include, but are not limited to:

- Applications, forms, correspondence and agreements (Information examples include your name, address, social security number, assets, liabilities, and income);
- Investment account statements and balances, investment activity and history, investment experience, and employment

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law.

For example, we disclose information, as permitted by law, to nonaffiliated companies that work for us in providing financial services to you (e.g., attorneys, auditors, clearing firms, and consultants). These companies are required to provide contractual assurances that confidentiality will be maintained.

In addition, we disclose information, as permitted or required by law, to government and regulatory agencies such as the Securities and Exchange Commission (SEC) and the Financial Industry Regulatory Authority (FINRA). We will make disclosures to comply with a legal summons, court order, subpoena or similar legal process, a fraud investigation, audit, or examination.

Finally, we are permitted to disclose information if you have provided your consent. **Confidentiality and Security Procedures:** We limit access to nonpublic personal information about you to those employees who need to know such information to provide services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

We will provide notice of our privacy policy upon any material changes and reserve the right to make changes on this policy as necessary. If you have any questions about our practices with respect to your nonpublic personal information, you may contact us by e-mail at partners@siviacapital.com.