



Privacy Policy

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. Capulent LLC along with our affiliates (together “Capulent”), strive to ensure that our customers are confident that we will manage their financial affairs and personal information expertly and confidently. To deliver these products and services as effectively and conveniently as possible, it is essential that we use technology to manage and maintain certain customer information. We want to assure our customers that whenever such information is used, it is done with discretion. The safeguarding of customer information is an issue we take seriously at Capulent. To affirm our continuing commitment to the proper use of customer information, we have set forth the following Privacy Principles.

1. **Recognition of a Customer’s Expectation of Privacy:** We believe the confidentiality and protection of customer information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our customers’ trust. Thus, the safekeeping of customer information is a priority for us.
2. **Use, Collection, and Retention of Customer Information:** We collect information from our customers, including information in forms and applications, information on the customer’s transactions and information from consumer reporting agencies. Capulent limits the use, collection, and retention of customer information to what we believe is necessary or useful to conduct our business, comply with laws and regulations, provide quality services, and offer products, services, and other opportunities that may be of interest to our customers. Information collected may include but is not limited to: name, address, tax identification number, employment status, investment objectives, risk tolerance, financial information, and information regarding prior transactions.
3. **Maintenance of Accurate Information:** Capulent recognizes that it must maintain accurate customer records. Therefore, we have established procedures to maintain the accuracy of customer information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.
4. **Limiting Employee Access to Information:** Employee access to personally identifiable customer information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer information and on those Privacy Principles. Because of the importance of these issues, all employees are responsible for maintaining the confidentiality of customer information and employees who violate these Privacy Principles will be subject to disciplinary measures up to and including termination of employment.



5. Protection of Information via Established Security Procedures: We recognize that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, we have established appropriate security standards and procedures to guard against any unauthorized access to customer information.

6. Sharing of Information to Unaffiliated Third Parties: Capulent will only share customer information with unaffiliated companies that assist us in providing our products and services to our customers; in the normal course of our business (for example, custodians, consumer reporting agencies and government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of a customer.

7. Maintaining Customer Privacy in Business Relationships with Third Parties: If we provide personally identifiable customer information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.

8. Disclosure of Privacy Principles to Customers: Capulent recognizes and respects the privacy expectations of our customers. We want our customers to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed these Privacy Principles. Customers who have questions about these Privacy Principles or have a question about the privacy of their customer information can call us at (800) 255-5181 or email jbachman@capulent.com. These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time without prior notice. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our customers.