

## CAPTRUST Privacy Policy

CapFinancial Partners, LLC (“CAPTRUST”) recognizes that its clients have an expectation that CAPTRUST and its affiliates will maintain the confidentiality of clients’ nonpublic personal information. Consequently, CAPTRUST has adopted this privacy policy concerning information obtained during the servicing of client’s account(s).

### **Nonpublic information**

Nonpublic information obtained by CAPTRUST for purposes of providing services hereunder will not be furnished to third parties for any other purpose other than in furtherance of the services to be provided hereunder. Notwithstanding the foregoing, CAPTRUST may disclose nonpublic information (i) to the extent such disclosure is required by court order or by a valid order of a governmental body governmental or quasi-governmental agency (such as FINRA) (ii) prior or after the time of disclosure such information becomes part of the public knowledge or literature, not as a result of any inaction or action of CAPTRUST, (iii) reasonably necessary for CAPTRUST to enforce its legal rights in any dispute with that client; or (iv) is approved by Client, in writing, for release. CAPTRUST does not disclose nonpublic personal information about its clients to any party except as permitted by law.

### **Sources of Personal Information**

We collect personal information about you from meetings with you and on applications or other forms you have submitted to CAPTRUST, as well as information about your investments or transactions with us or others (such as third-party service providers or fund companies) from other sources.

### **How CAPTRUST Protects the Confidentiality of Clients’ Nonpublic Personal Information**

CAPTRUST does not sell or trade clients’ information with nonaffiliated companies. When information is provided to third party service providers, safeguards are in place to assure that information is used only for the purpose it is provided. CAPTRUST maintains its records on secured computers. Prospective employees are screened for criminal convictions. Once hired, employees are made aware of CAPTRUST’s privacy policy and of the confidential nature of the information they handle. Employees are limited to accessing only that customer information that is necessary to perform their job functions.

**To Whom This Policy Applies:** This Notice applies to all our clients who enter into an Advisory Services Agreement with us. Our Former Clients: Even if you are no longer a client, our Privacy Policy will continue to apply to you. For California Residents: See Supplemental Privacy Notice available at <https://captrust.com/privacy-policy/> .

### **Access to and Correction of Information**

Upon the written request of clients, we will make available for their review any file we may maintain for their personal Information; provided, however, that any information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available. If clients notify us that any Information is incorrect, we will review it. If we agree, we will correct our records. If we do not agree, clients may submit a short statement of dispute, which we will include in any future disclosure of the disputed Information.

### **Further Information**

We reserve the right to change this privacy policy at any time. The examples contained within this privacy policy are illustrations and are not intended to be exclusive. This policy attempts to comply with federal and state regulations regarding privacy. Clients may have additional rights under other foreign or domestic laws that may apply to them.

### **“Opt Out” Provision**

Since CAPTRUST does not sell or share any personal information an “opt out” provision would not be applicable to this privacy policy. Clients may call (800) 216-0645 to request further information regarding this policy.

### **Use of Cookies**

An internet cookie is a small amount of data that is placed on to your machine from a website and stored in your internet browser. Cookies allow our website to store things like preferences, so that it can recognize you when you come back respond appropriately. CAPTRUST makes use of cookies to improve the load times and functionality of the website, and in some cases registration pages. CAPTRUST may from time to time also utilize data tracking software to assist us in spotting trends, and areas of improvement in the website. By using this site, you are consenting your express approval allowing us to utilize these technologies so that we can improve our service and product for you. CAPTRUST may also use various third-party cookies to report usage statistics of the service. CAPTRUST also may use cookies to authenticate users and prevent fraudulent use of user accounts.