



NOTICE OF PRIVACY POLICY

This policy is designed and adopted with recognition that protecting the privacy and security of the non-public personal information we obtain about our customers is an important responsibility.

Federal law requires us to tell you how we collect, share, and protect your non-public personal information. The types of non-public personal information we collect and share can include items such as your name, social security number and income, your account number, balances, transaction history, and assets. Even when you are no longer our customer, we will only share your non-public personal information as described in this notice..

We collect your non-public personal information in a variety of ways. For example, we obtain your non-public personal information when you open an account or give us your income information, tell us about your portfolio or deposit money, or enter into an investment advisory contract. We also collect your non-public personal information from other companies such as the custodians who hold your account assets.

Federal law gives you the right to limit only sharing non-public personal information: 1) about your credit worthiness for our affiliates' everyday business purposes; 2) about you with our affiliates to market to you; and 3) with non-affiliates to market to you. We don't share nonpublic personal information about your creditworthiness with our affiliates for their everyday business purposes; with our affiliates to market to you; or with non-affiliates to market to you. We also don't share your nonpublic personal information for joint marketing with other financial companies. State laws and individual companies may give you additional rights to limit sharing.

We share your non-public personal information for our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, to protect the confidentiality or security of your records, or as permitted by law. We also share your non-public personal information with a non-affiliate for the purpose of aggregating it and providing summary information based on this data to our parent company, Focus Financial Partners, LLC.

To protect your non-public personal information from unauthorized access and use, we use security measures which include computer safeguards and secured files and offices.

Our policy about obtaining and disclosing non-public personal information may change from time to time. We will provide you notice of any material change to this policy before we implement the change. For any questions, please contact our Chief Compliance Officer at 212-302-6300.