

## **PRIVACY POLICY**

In the course of client relationships, Anselme Capital (AC) gathers and maintains personal, non-public information regarding its clients' financial circumstances and investment objectives. AC is committed to maintaining the privacy and confidentiality of this client information. Accordingly, AC has adopted a privacy policy in accordance with SEC and FTC privacy regulations which require investment advisers to determine and disclose how they treat nonpublic information about their clients and potential clients.

A. AC may collect nonpublic personal information about AC's clients and potential clients from the following sources:

- Information received from account applications, questionnaires, interviews, information forms and other client interactions;
- Information about transactions with AC, AC's affiliates, or others; and
- Information AC obtains or receives from a consumer reporting agency.

All client information is to be maintained in AC's master client files and/or stored on appropriate electronic media. Information from potential clients may be filed in temporary files, but shall be subject to the same restrictions and limitations as other client files outlined below.

B. Adviser personnel will not share or disclose nonpublic information regarding any client or potential client of AC, except (i) as necessary to service client accounts including, without limitation, the settlement, billing, processing, clearing, or transferring of client transactions; or (ii) as otherwise directed by a client. Access to all client files and information, whether in paper or electronic format, is limited to Adviser personnel for the purposes of servicing client accounts.

C. Adviser personnel may not remove client files or information from AC's premises unless (i) it is necessary to service client accounts; and (ii) prior written approval is obtained from the Chief Compliance Officer (Marc Anselme).

D. AC will provide clients with a privacy notice (the "Privacy Notice") when the client engages AC for advisory or other services. The Privacy Notice shall detail the types of nonpublic client information AC collects, the information AC shares with third parties or with affiliates, the kinds of third parties with which AC shares information, the policies and practices AC has in place to protect the confidentiality and security of nonpublic client information; the procedures AC has in place to permit clients or potential clients to opt out of information sharing arrangements with third parties (inapplicable to AC so

long as AC only shares information with third parties for purposes of servicing client accounts), and AC's disposal policy.

- E. AC shall distribute an updated Privacy Notice to all of its clients annually, even if the policy has not changed since the previous year.
- F. Privacy Notices shall be sent by mail or by digital distribution (such as using a digital mailbox), and may be included in a quarterly report, newsletter or other client mailing. A copy of AC's current Privacy Notice appears on the next page.
- G. AC has undertaken to protect client information in the course of its disposal as well.
- G. The Chief Compliance Officer is responsible for evaluating AC's compliance with this privacy policy.

# NOTICE OF PRIVACY POLICY

*This is for your information only. No action is required on your part.*

Protecting your privacy is very important to Anselme Capital (AC). I want you to understand what information AC collects and how it is used. AC collects and use “nonpublic private information” in order to provide clients with a broad range of financial services as effectively and conveniently as possible. AC treats nonpublic personal information in accordance with our privacy policy.

## What Information Does AC Collect and From Whom AC collects It

AC may collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates or others; and
- Information we receive from non-affiliated third parties, including consumer reporting agencies.

“Nonpublic personal information” is nonpublic information about you that we obtain in connection with providing a financial service or product to you.

## What Information We Disclose and To Whom AC Discloses It

AC does not disclose any nonpublic information about you without your express consent, except as permitted by law. This applies to current as well as former clients. AC restricts access to your nonpublic personal information to those employees, affiliates and independent third parties who need to know that information in order to provide products services to you.

AC’s “affiliates” are companies with which we share common ownership. AC does not currently have any affiliated companies.

## AC’s Security Procedures

AC maintains physical, electronic and procedural safeguards to protect your nonpublic personal

information. This includes measures to protect your information in the course of its disposal.