

Christy Capital Management Privacy Policy and Notice to Clients

5. Privacy Policy

Definitions

For purposes of this policy, the terms “*Consumer*”, “*Client*” and “*Confidential Information*” have the following definitions:

“*Consumer*” is not necessarily a client but may be anyone who obtains financial products or services from CCM used primarily for personal, family or household purposes. Examples of consumer relationships include: (1) a prospect with whom CCM is actively pursuing an investment or product relationship; or (2) a prospect who provides CCM with nonpublic information (such as net worth information or potential portfolio size) after attending a seminar or community event or listening to a radio talk show at which an employee or contractor of CCM is a featured speaker.

“*Client*” means (1) an individual with a specific and continuous relationship with CCM who obtains or has obtained a financial product or service from CCM used primarily for personal, family or household purposes; or (2) that individual’s designated representative.

“*Confidential Information*” is personally identifiable private information (information not available from public sources such as the phone book or a website) about the client or consumer, including information regarding name and address, age, social security number, assets, income, net-worth, account balance, account number, bank account information, beneficiary information and investment activity (such as purchase and redemption history).

5.2 Overview

CCM collects nonpublic information about clients and consumers. We will not share nonpublic personal information about clients or consumers with third parties not affiliated with CCM, except as noted below. Specifically, CCM may share personal information as necessary:

To complete transactions or account changes as directed by the client;

To maintain or service a client’s account;

If requested to do so by a client;

D. With contracted service providers providing administrative functions for CCM; or

E. If CCM is required or permitted by law or regulatory authorities with jurisdiction over the firm to do so.

5.3 Privacy Notices

The following notice requirements apply to CCM’s clients.

Initial Privacy Notices

We will deliver an initial privacy notice ([Appendix C](#)) to a client before the client relationship is established – that is, before we begin to manage a client’s account. We may deliver the privacy notice within a reasonable period of time after the client relationship is established if the client agrees to receive the notice at a later time.

Annual Privacy Notices

Christy Capital Management Privacy Policy and Notice to Clients

We will deliver our privacy notice ([Appendix C](#)) to clients on an annual basis, defined as every 12 months. We are not required to deliver annual privacy notices to former clients.

Revised Privacy Notices

We will not disclose nonpublic personal information about a client to a non-affiliated third party other than as described in this policy or as permitted by Regulation S-P unless:

We have provided the client with a revised notice describing the new policy;
We have provided the client with an “opt out” notice; and
We have provided the client a reasonable opportunity to opt out of the disclosure before CCM discloses the information to the non-affiliated third party.

CCM is not required to send privacy notices or provide opt-out elections to consumers unless we intend to share the consumer’s nonpublic personal information with a non-affiliated third party.

5.4 Safeguarding of Client Records and Information

CCM will maintain administrative, technical and physical safeguards reasonably designed to ensure the security and confidentiality of client records and information. To protect this information, we:

Require new employees and contractors to review and acknowledge the firm’s compliance policy manual, which includes this privacy policy, and all employees and contractors to review and acknowledge the compliance policy manual annually or when changes are made.

Prohibit an employee or contractor from providing client information over the telephone or in response to an e-mail message unless the employee or contractor has identified the other person as the client, a fiduciary representative of the client, an authorized agent of the client or a party that needs the information to complete a transaction for the client (such as broker-dealers, custodians or administrative service providers).

Limit access to confidential information about clients to those employees and contractors who need to know such information.

Maintain appropriate security measures for our computer and information systems, including the use of passwords and firewalls.

Use a shredding machine, locks and other appropriate physical security measures to safeguard client information stored in paper format.

Engage a third party service provider only after we have entered into a contractual agreement that prohibits the service provider from disclosing or using confidential personal information except as necessary to carry out its assigned responsibilities and only for that purpose.

Christy Capital Management Privacy Policy and Notice to Clients

Appendix C

CHRISTY CAPITAL MANAGEMENT, INC. (CCM) PRIVACY POLICY NOTICE

Our Promise to You

As a client of CCM, you share both personal and financial information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information.

Information Provided by Clients

In the normal course of doing business, we typically obtain the following non-public personal information about our clients:

- Personal information regarding our clients' identity such as name, address and social security number;
- Information regarding securities transactions effected by us; and
- Client financial information such as net-worth, assets, income, bank account information and account balances.

How We Manage and Protect Your Personal Information

We do not sell information about current or former clients to third parties, nor is it our practice to disclose such information to third parties unless requested to do so by a client or client representative or, if necessary, in order to process a transaction, service an account or as permitted by law. Additionally, we may share information with outside companies that perform administrative services for us. However, our contractual arrangements with these service providers require them to treat your information as confidential.

In order to protect your personal information, we maintain physical, electronic and procedural safeguards to protect your personal information. Our Privacy Policy restricts the use of client information and requires that it be held in strict confidence.

Client Notifications

We are required by law to annually provide a notice describing our privacy policy. In addition, we will inform you promptly if there are changes to our policy.

Please do not hesitate to contact us with questions about this notice.