

## ALTAVRA *Privacy Policy*

### :: Protecting Your Confidential Information

At ALTAVRA Inc., we value our relationship with each of our customers, and we appreciate the trust that you have placed in us. We recognize that you have concerns about the confidential personal information we obtain about you throughout our relationship. Because protecting your confidential information is important to us, we have adopted a privacy policy which governs how the confidential information we obtain about you is used and maintained. We pledge to protect that information and ensure that it remains private. The information in this notice summarizes the categories of personal information that we collect about you, how that information is handled, and how we protect that information.

We do not disclose any nonpublic personal information about our customers to anyone, except as required or permitted by law. ALTAVRA does not sell personal information obtained about you to companies that are not associated with ALTAVRA for the purpose of marketing their products or services to you.

### :: Collection and Use of Personal Information

The privacy policy set forth in this notice applies to ALTAVRA and affiliated companies of ALTAVRA. We collect nonpublic personal information about you from the following sources, solely for the purposes specified:

... Information we receive from you on account applications or other forms, such as name, address, federal tax identification number, income, assets and similar information. We use this information to administer the accounts we maintain on your behalf, process transactions requested by you, respond to your inquiries, evaluate your investment needs, and identify other products and services that may interest you.

... Information about your transactions with us or our affiliates, such as your account balance, transaction history and payment activity. This information is used to process transactions you request and ensure the accuracy of the records and reports we maintain that relate to your account. We may also collect various other types of data, such as transaction, site navigation and optional survey information, in connection with your use of online services we make available to you, either directly or through other entities. We use this information in order to improve the quality of the services we offer you.

... Information we receive from consumer reporting agencies, such as credit relationships and credit history. We use this information to help determine your eligibility for ALTAVRA products and services, collect or report debts owed to us, and protect our rights and property.

### :: Sharing of Information Within ALTAVRA

The information we collect relating to your transactions and experiences with ALTAVRA or any affiliate may be shared among ALTAVRA's affiliates. We may also share some or all of the information we receive about you from consumer reporting agencies, such as credit information.

### :: Sharing of Information Outside ALTAVRA

As permitted by law, we may disclose some or all of the information described above with entities that are not affiliated with ALTAVRA for the purpose of servicing your ALTAVRA accounts, improving our services, providing products and services you've requested from ALTAVRA, and informing you about products or services available from ALTAVRA that may be of interest to you. Such companies may include:

...: Companies that are the source or origin of financial services offered by ALTAVRA, such as banks, securities broker-dealers, mutual fund companies and insurance companies.

...: Nonfinancial companies, such as companies that perform services on our behalf, e.g., check printers, quote vendors, companies that prepare account statements for us, companies that assist us in communicating or marketing our services.

...: Others, such as independent contractors or technical system consultants who program our software, government agencies and regulators, consumer reporting agencies, and other outside entities as permitted or required by applicable laws.

#### **:: Protecting the Confidentiality of Your Personal Information**

All ALTAVRA employees are instructed to use strict standards of care regarding the confidentiality of your nonpublic personal information as outlined in firm policies. Employees not adhering to our firm policies are subject to disciplinary action. We require outside companies and independent contractors to whom we provide customer information for marketing, servicing or processing to enter into a confidentiality agreement that restricts the use of the information to those purposes. We maintain physical, electronic and procedural safeguards that comply with applicable laws to protect your nonpublic personal information.

If you have any questions or comments about our privacy policy, please contact ALTAVRA at 800-998-7870 or [clientservices@altavra.com](mailto:clientservices@altavra.com).