



TRAC Asset Management, LLC PRIVACY POLICY NOTICE

TRAC Asset Management, LLC is committed to adhering to the requirements and expectations regarding the privacy of personal information. Privacy regulations are founded upon three definitions:

1. **Consumer** – a person who has not entered into an investment advisory relationship but has disclosed non public personal information to our firm.
2. **Client** – a person who has entered into an investment advisory relationship with the firm or that individual's designated representative.
3. **Confidential Information** – personally identifiable private information, not available from public sources, about a client or consumer. It generally includes name, address, age, social security number, assets, income, net-worth, account balances, account numbers, beneficiary information, or investment history.

Our firm collects nonpublic information about client and consumers. We will not share nonpublic information about clients or consumers with third parties not affiliated with our firm, except as noted below:

- To complete transactions or account changes, as directed by the client
- To maintain or service a client's account
- If requested by the client
- With entities under common ownership and control of our firm
- With contracted third-parties who require the information to develop, support and deliver services
- If our firm is required or permitted by law or regulatory authorities with jurisdiction over the firm

As a client of our firm your privacy is important to us. We are dedicated to safeguarding your personal and financial information. We restrict access to confidential personal information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards to comply with federal standards to guard your confidential personal information. We continue to safeguard and keep confidential the personal and financial information of all present and past clients.

We will notify you in advance if our privacy policy is expected to change. We are required, by law, to deliver this Privacy Notice to you annually, in writing.

Please contact us with any questions about this policy.

If you wish for us not to share your information as stated above, please contact us by:

- Calling us at 800-627-4132 or Compliance@tracassetmanagement.com
- Contact us by mail at:

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