

Highgate Securities Investments Privacy Policy

Highgate Securities Investments understands that protecting your financial privacy is just as important as protecting your financial assets. We are committed to the responsible use of information in order to provide you with services and to help you achieve your financial goals. This statement of our privacy policy is intended to help you understand the ways in which we gather, use, and protect your financial information.

This Privacy Policy describes the way that we treat non-public personal information that we may obtain from our customers or from consumers generally.

Collection of Nonpublic Personal Information

We collect information to provide investment management services to you, to protect you from fraud, and to make available products and services that may be of interest to you. We collect nonpublic personal information about you from the following sources:

- Information you relay directly to us. This most often is comprised of verbal descriptions of your financial circumstances and goals, as well as investment account statements, tax returns, estate planning documents, and other items you may provide. Additionally, you may direct others, such as your accountant or attorney, to provide information about you to us.
- Information we receive from you through transactions, correspondence, and other communications with us; and
- Information we otherwise obtain from you in connection with providing you a financial product or service.

Information Sharing with Non-Affiliated Third Parties

We do not share any non-public personal information about our customers or former customers with anyone, unless required by law or permitted by law, directed by you, or enumerated below. For example, you may ask us to supply certain information directly to your accountant, attorney or perhaps to your banker. Additionally, we may disclose limited information to companies or organizations that help us maintain and service your account. For instance, we will share limited information with the custodian of your assets if it is required by them to properly service or update your account. In addition, we may share non-public personal information to protect against fraud. Finally, we may share limited information with our accountants, auditors, or other service providers as required by us to responsibly operate and monitor our business and comply with regulatory requirements.

Security

For your protection, Highgate Securities Investments maintains security standards and procedures that we continually update to safeguard against unauthorized disclosure of information or access to information about you.

We restrict access to non-public personal information about you to those individuals who need to know that information to provide products and services to you. We maintain physical, electronic, and procedural safeguards to guard your non- public personal information.

Highgate Securities Investments continuously stresses to its employees the importance of protecting confidential information. All employees of Highgate Securities Investments are required to sign a Non-Disclosure Agreement as a condition of their employment and continued employment with the company.

In securing electronic records, we make extensive use of password protection and our computers reside behind a firewall to protect against unauthorized access. Encrypted backups of client data occur each day and are stored on secure servers at an online location. For further protection, we convert most paper documents to electronic format to protect against fire, flood, vandalism, and unauthorized access. All documents containing client identification or non-public personal information that are being discarded are first shredded. Transmission of client data to our primary custodian is encrypted using advanced technology such as 128-bit Secure Sockets Layer 3 (SSL3) encryption.

Email

Highgate Securities Investments uses email to communicate with certain consumers and customers. While we do not share non-public personal information conveyed via email, except as described above, IT IS POSSIBLE THAT EMAIL TRANSMISSIONS CAN BE READ BY UNAUTHORIZED THIRD PARTIES, INCLUDING INTERNET SERVICE PROVIDERS OR COMPUTER HACKERS.