

KOOMAN & ASSOCIATES

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PRIVACY NOTICE

Kooman & Associates (“K&A”) maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients’ nonpublic personal information (“information”). Through this policy and its underlying procedures, K&A attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

K&A collects information about clients from the following sources, but not limited to the following sources, in connection with providing services: (1) personal information received from clients, whether in person, in writing, by telephone or otherwise, (2) personal information from transactions, (3) websites, educational platforms and portals, and (4) personal information from third-parties such as accountants, legal counsel, financial advisors, insurance agents, banking institutions, and brokerage firms.

The personal information is used for, but not limited to, the following purposes: (1) monitor, audit, evaluate and otherwise administer K&A services, (2) provide clients with access to protected areas of K&A’s website, (3) provide continuous service to clients and to conduct business processing functions including by providing personal information to our contractors, service providers, or other third parties, (4) assist with the administrative, marketing (including direct marketing), planning, or service development, quality control or research purposes of K&A and its contractors and service providers, (5) communicate with you and respond to your inquiries, (6) protect against, identify and prevent fraud, copyright infringement, unauthorized use and distribution of protected content and other unlawful activity, claims and liabilities, (7) perform data analyses (such as market and customer research), (8) conduct investigations and comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies and terms, or (9) for other purposes required or authorized by law, including other purposes for which clients have provided consent.

It is the policy of K&A to restrict access to and/or the sharing of all current and former clients’ information (i.e., information and records pertaining to personal background [including social security number and address], investment objectives, financial situation, financial planning issues, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in furtherance of the client’s engagement of K&A.

K&A does not sell non-public personal information. K&A shall disclose, as necessary, the client's information: (1) to unaffiliated service providers and vendors in furtherance of establishing, maintaining, and reporting on the client's K&A relationship (i.e., broker-dealer, account custodian, record keeper, technology, performance reporting, customer relationship management software [CRM], proxy voting, insurance, independent managers, sub-advisers, etc.); (2) if required to do so by judicial or regulatory process; or (3) as otherwise permitted to do so in accordance with applicable federal and/or state privacy regulations.

However, K&A does not, and shall not, disclose or share information with any affiliated or nonaffiliated persons, entities or service providers for marketing or any other purposes or reasons not referenced above. To the extent U.S. Federal laws apply to client's personal information, clients have the right to limit (1) sharing for affiliates' everyday business purposes—information about their creditworthiness, (2) affiliates from using their information to market to them, and (3) sharing for nonaffiliates to market to them. U.S. state laws and individual companies may give clients additional rights to limit sharing. To the extent permitted by the applicable laws of the jurisdiction, clients may request: (1) to have their personal information corrected, for example, if it is incomplete or incorrect, (2) to opt out of receiving marketing communications at any time or (3) the right to file a complaint with an applicable government regulator such as a Data Protection Authority.

K&A may transfer clients' personal information obtained to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which a client initially provided the information. To the extent required by applicable law, when K&A transfers client's information to recipients in other countries (such as the United Kingdom, Ireland or Cayman Islands), K&A will protect that information as described in this Privacy Notice.

K&A will endeavor to ensure clients' personal information is kept accurate, complete, up to date, and relevant. Clients should notify K&A if any information changes. If personal information is not accurate, complete, or up to date, please notify K&A and the Firm will take reasonable steps to ensure it is corrected. This Privacy Notice may change from time to time. Such changes shall be effective immediately upon notice. This Privacy Notice is for general guidance and does not constitute a contract or create legal rights and does not modify or amend any agreement K&A has with clients.

ANY QUESTIONS OR CONCERNS: Should you have any questions regarding the above, please contact Jeffrey Starkey, Chief Compliance Officer.