

PRIVACY POLICY

Relevance Capital Management (“RCM”, “firm”, “we”, or “our”), as a registered investment adviser, is covered under the definition of a “financial institution” under the Gramm-Leach-Bliley Act and the Securities and Exchange Commission’s (“SEC”) Privacy of Consumer Financial Information Rule (“Regulation S-P”). This document describes the types of information we collect in connection with our investment advisory business, why and how we collect such information, who is permitted to access such information, as well as our policy with respect to handling nonpublic personal information. This Privacy Policy applies to all prospective, current, and former clients.

TYPES OF INFORMATION WE COLLECT

We routinely obtain personal information about our clients in order to provide financial and investment advisory services. This information typically includes, but is not limited to, the following:

- Name and address
- Date of birth
- Social Security Number
- Financial account numbers, balances and transactions
- Employment and earnings information
- Tax forms and returns
- Financial circumstances
- Investment objectives and experience
- Account statements and trade confirmations

WHY AND HOW WE COLLECT PERSONAL INFORMATION

We collect the above types of information in order to (i) set up and maintain our clients’ investment accounts with a custodian, (ii) advise clients with respect to an appropriate asset allocation given their circumstances and objectives, (iii) manage our clients’ investments and investment accounts, (iv) provide tax-planning advice, and (v) prepare, monitor, and revise financial-planning projections. We obtain personal nonpublic information in a number of ways, including account-setup paperwork, tax forms and returns, account statements, information forms, and verbal discussions with you.

COMMITMENT TO YOUR PRIVATE INFORMATION

RCM and our owners and employees recognize that, as a “financial institution,” our business involves the

collection of personal nonpublic information from our clients. We further understand that, by sharing this information with us, our clients have placed a great deal of trust and confidence in us. We take this trust and confidence seriously, and our policy is to protect any and all nonpublic personal information collected by us in connection with our business. Therefore, we do not provide, sell, or otherwise share your personal information with outside firms, organizations, or individuals except as required or permitted by law or as requested by you.

WITH WHOM DOES RCM SHARE YOUR PERSONAL INFORMATION?

In the ordinary course of our business, we may share your information with regulators, financial institutions, and other service providers that assist, support and facilitate our servicing of your account(s). For example, RCM may share your information: (1) with individuals and/or entities not affiliated with RCM, including, but not limited to, your other professional advisers and/or service providers (e.g. attorney, accountant, insurance agent, broker-dealer, custodian); (2) with individuals and/or entities not affiliated with RCM that facilitate the services we provide to you (e.g. data-storage provider, software providers (e.g. financial planning, tax planning, trading, etc.), and compliance consultants); (3) if required to do so by judicial or regulatory process; or (4) as otherwise permitted in accordance with the parameters of applicable federal and/or state privacy regulations.

Because RCM only shares nonpublic information in order to service client accounts, we do not disclose any nonpublic personal information about our clients to anyone, except as permitted by law. If there is a change to our Privacy Policy that would allow us to disclose non-public information not covered under applicable law, we will allow our clients the opportunity to opt out of such disclosure.

INFORMATION SECURITY

RCM maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients' nonpublic personal information. Through this policy and its underlying procedures, RCM 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. These protections extend to prospective, current and former clients of the Firm.

CHANGES TO THIS POLICY

RCM provides each client with initial notice of our current Privacy Policy when the client relationship is established. We will also provide each client with a new notice of our current Privacy Policy at least annually. If, at any time, we adopt material changes to our privacy practices, we will provide each client with a revised notice reflecting the new privacy practices.

CONTACT US

If you have questions or concerns regarding our Privacy Policy, we encourage you to contact our Chief Compliance Officer, Casey Rensch. Casey can be reached directly via email at casey@relevancecm.com, or by phone at (940) 387-7526.