

## **PRIVACY POLICY NOTICE – EGGERSS CAPITAL MANAGEMENT**

Eggerss Capital Management adopted this policy with recognition that protecting the privacy and security of the nonpublic personal information we obtain about our clients is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain nonpublic personal information about you. We want you to know what information we collect and how we use and safeguard that information.

### **WHY WE COLLECT YOUR INFORMATION**

We gather information about you and your accounts so that we can (i) know who you are and thereby prevent unauthorized access to your information; (ii) design and improve the products and services we offer; and (iii) comply with the laws and regulations that govern us.

### **WHAT INFORMATION WE COLLECT**

We collect certain nonpublic personal information about you (such as your name, address, social security number, etc.) that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.). In addition, If you visit our Web site, we may collect information via a Web server, often referred to as a “cookie.” Cookies indicate where a site visitor has been online and what has been viewed.

### **WHAT INFORMATION WE DISCLOSE**

Eggerss Capital Management does not disclose the nonpublic personal information we collect about our clients to anyone except: (1) in furtherance of our business relationship with clients, and then only to those persons necessary to effect the transactions and provide the services that clients authorize (such as broker-dealers, custodians, independent managers etc.); (2) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (3) our attorneys, accountants, and auditors; or (4) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative services on our behalf). These third parties are prohibited to use or share the information for any other purpose. If you decide to either terminate our services or become an inactive client, we will continue to adhere to our Privacy Policy, as may be amended from time to time.

### **SECURITY OF YOUR INFORMATION**

We maintain physical, electronic and procedural safeguards to guard your personal account information. To further protect your privacy, our Web site uses the highest levels of Internet security, including data encryption, user names and passwords, and other tools. We also restrict access to your personal and financial data to authorized Eggerss Capital Management associates who have a need for these records. We require all nonaffiliated organizations to conform to our privacy standards and are contractually obligated to keep the information provided confidential and used as requested. Furthermore, we will

continue to adhere to the privacy policies and practices described in this notice even after your account is closed or becomes inactive.

We will continue to conduct our business in a manner that conforms with our pledge to you, your expectations and all applicable laws.

#### **CHANGES TO OUR PRIVACY POLICY OR RELATIONSHIP WITH YOU**

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.

#### **OPTING OUT**

Clients cannot opt out of allowing Eggerss Capital Management to share their nonpublic personal information with non-affiliated third parties that require such information to service your accounts.

#### **Requests for Information**

For a copy of our Privacy Policy, please contact the Chief Compliance Officer either in writing at 114 E. Highland, Boerne, Texas 78006, or by phone at (210) 526-0057.