



PRIVACY POLICY

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to insure that our customers are confident that we will manage their financial affairs expertly and confidentially.

At BerylStone Asset Management (the "Firm"), our clients have access to a range of investment management and consulting services. To deliver these services as effectively and conveniently as possible; it is essential that we use technology to manage and maintain certain customer information.

We want to assure all of our customers that whenever our Firm accesses personal information, it is done with discretion. The safeguarding of customer information is an issue we take seriously. To affirm our continuing commitment to the proper use of customer information, we have set forth the following Privacy Principles. It is these Privacy Principles that guide us in serving the privacy needs of our clients.

- 1. Recognition of a Customer's Expectation of Privacy:** At our Firm, we believe that the confidentiality and protection of customer information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our customers' trust. Thus, the safekeeping of customer information is our priority.
- 2. Use, Collection, and Retention of Customer Information:** Our Firm limits the use, collection, and retention of customer information to what we believe is necessary to conduct our business and provide quality service. Information collected may include, but is not limited to: name, address, telephone number, tax identification number, date of birth, employment status, annual income, assets, liabilities and net worth.
- 3. Maintenance of Accurate Information:** Our Firm recognizes that it must maintain accurate customer records. Therefore, we have established procedures to maintain the accuracy of customer information as well as to keep such information current and complete. These procedures include promptly responding to all requests to correct inaccurate information in a timely manner.
- 4. Limiting Employee Access to Information:** At our Firm, employee access to personally identifiable customer information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer information and on these Privacy Principles. Because of the importance of these issues, all Firm employees are responsible for maintaining the confidentiality of customer information. Employees who violate these Privacy Principles will be subject to severe disciplinary measures.
- 5. Protection of Information via Established Security Procedures:** Our Firm recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, our Firm has established security standards and procedures to guard against any unauthorized access to customer information.



6. **Restrictions on the Disclosure of Customer Information:** When it comes to sharing customer information with unaffiliated companies, our Firm places strict limits on who receives specific information about customer accounts and other personally identifiable data. We may share information with unaffiliated companies that directly assist us in providing our services to our customers in the normal course of business; when legally required or permitted in connection with fraud investigations and litigation; and at the request or with the permission of a customer. In these cases, we provide the minimum information required.
7. **Maintaining Customer Privacy in Business Relationships with Third Parties:** If we provide personally identifiable customer information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.
8. **Disclosure of Privacy Principles to Customers:** Our Firm recognizes and respects the privacy expectations of our customers. We want our customers to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed these Privacy Principles that are made readily available. Customers who have questions about these Privacy Principles or have a question about the privacy of their customer information should contact Scott Bryant at shbryant@berylstone.com.

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time without prior notice. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our customers. By signing below, the Client acknowledges