



Keel Point

Client Privacy Policy

At Keel Point, LLC, and Keel Point Capital, LLC, (collectively "Keel Point"), we are committed to protecting your privacy and the confidentiality of your personal and financial information. The measures we take to keep your personal information private and secure are outlined below.

How We Protect Confidentiality - Keel Point uses procedural, physical and electronic system safeguards to store and secure information about you in compliance with applicable state and federal standards. Our systems protect your information from unauthorized access, alteration, and destruction. Access is permitted only to those individuals within our organization who need the information to perform their job responsibilities. When we enter into agreements with other companies to provide us with services or to make products and services available to you, we include a confidentiality clause. Under such an agreement, these companies may receive information about you, but they may only use it for the intended purpose for which we have contracted with them to benefit you.

Persons Covered by the Client Privacy Policy - The Keel Point Client Privacy Policy applies to anyone who is a current or former Keel Point client or who registers with one of our services or promotional offers. We provide you with a copy of this policy when you open an account, and we send you annual notifications thereafter. If we change our policy regarding the sharing of information, we will notify you in advance and give you the opportunity to "opt out" of such disclosure.

How We Obtain Information About You - In the normal course of business, we collect, retain, and use information about you to serve your financial needs, administer your account(s) and inform you of products and services that may be of interest. This data, known as non-public personal information, may be collected from several sources, including: a) applications and other forms you file with us (e.g., name, assets, income); and b) records of transactions with us, our affiliates, non-affiliated third-parties and others (e.g., credit report). Because we strive to provide you with the best possible service, the accuracy and completeness of your personal information is important to us. We ask that you review your information regularly to ensure that it is correct. Please contact your account representative or Keel Point directly if you need to correct or update your personal information.

Sharing Information With Whom and Why - Keel Point does not sell your personal information to anyone. We restrict the types of information we share and the types of entities with whom we share it. The primary reason for sharing information about you is to increase your convenience in transacting business with us and to give you more financial service choices. We do not disclose your personal information to non-affiliated third-parties, unless one of the following exceptions applies:

- a) We disclose personal information to service providers that assist us in processing your transactions or servicing your account(s). An example would be the company that prints and mails your account statement.
- b) We disclose or report personal information in limited circumstances when we believe in good faith that disclosure is required or permitted under law. For example, we would provide information in cooperation with securities regulators or law enforcement authorities, to resolve consumer disputes, or to perform credit evaluations and authentication checks.
- c) Keel Point has multiple correspondence relationships, including but not limited to Fidelity, Schwab, and Orion. These companies work with us to service your financial needs. The sharing of your information among our correspondents enables us to serve you more efficiently and makes it more convenient for you to do business with us. We are permitted by law to share information with our correspondents about your account history and your experiences with us. All of our correspondents follow similar privacy policies.

Internet Security - Clients who have the ability to access their accounts online are required to log-on with their username and individually selected password. Your password is known solely by you, as the client, and should never be shared with anyone. You may change your password as often as you wish.

Keel Point ensures that cryptographic mechanisms are employed to protect access to client accounts as well as the client information therein, both in transit and at rest. Keel Point evaluates the security of all third-parties associated with the access and hosting of client accounts. Keel Point will continue to enhance security procedures as new technologies become available.

Each time you access your account please log-off when you are finished. This will prevent someone else from accessing your account if you leave your computer and your session hasn't automatically shut down.

Keel Point employees use information about you to respond to your needs and to provide you with information about specific products in which you may have an interest. We instruct our employees to use strict standards of care in handling the personal and confidential information of customers and remind them on a regular basis of their obligations with regard to the confidentiality of customer information.

Option of Opt-Out and Change Notices - If for any reason at any time in the future, we find it necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change and the opportunity to opt-out of such disclosure. For your reference, a similar privacy policy is available by mail from Fidelity or Schwab. If you have questions or concerns, please contact us via email at compliance@keelpoint.com or by calling our Chief Compliance Officer at 256.704.5111.