

## Privacy Policy

<b>FACTS</b>	<b>WHAT DOES CLINTON INVESTMENT MANAGEMENT, LLC (“CIM”) DO WITH YOUR PERSONAL INFORMATION?</b>
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. The information can include your:</p> <ul style="list-style-type: none"> <li>▪ Social Security/tax identification number</li> <li>▪ assets, income, account balances, investment activity and accounts with other institutions</li> <li>▪ investment experience and your employment information</li> <li>▪ wire transfer instructions</li> </ul> <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons CIM chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does CIM share?	Can you limit this sharing?
<b>For our everyday business purposes-</b> Such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes-</b> To offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We don’t share
<b>For our affiliates’ everyday business purposes-</b> Information about your transactions and experiences*	No	We don’t share
<b>For our affiliates’ everyday business purposes-</b> Information about your creditworthiness*	No	We don’t share
<b>For nonaffiliates to market to you</b>	No	We don’t share

Questions?	Call CIM at (203) 276-6246
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\*CIM has no affiliates.

Who we are	
Who is providing this notice?	Clinton Investment Management, LLC
What we do	
How does CIM protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does CIM collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>▪ Enter into an investment advisory agreement</li> <li>▪ Give us your asset and income information</li> <li>▪ Provide account information or your contact information</li> <li>▪ Show your driver's license or your government-issued ID</li> </ul>
Why can't I limit sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>▪ Sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>▪ Affiliates from using your information to market to you</li> <li>▪ Sharing for nonaffiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>▪ <i>CIM has no affiliates.</i></li> </ul>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>▪ <i>CIM does not share with nonaffiliates so that they can market to you.</i></li> </ul>
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>▪ <i>CIM does not jointly market.</i></li> </ul>
Other important information	
<b>California:</b> Except as permitted by law, we will not share personal information we collect about California residents with nonaffiliates and we will limit sharing such personal information with our affiliates to comply with California privacy laws that apply to us.	