

# FIFTH CAPITAL MANAGEMENT, LLC

## PRIVACY NOTICE

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Fifth Capital Management, LLC ("Fifth Capital") considers the protection of personal information to be the foundation of client trust. It is this very trust on which our business is based. It is our intention to ensure that this information is safeguarded to protect against its misuse. To that end, we are providing you our Privacy Policy to remind you of our concern for and our efforts related to the protection of, your personal, non-public information.

### **Fifth Capital's Privacy Policy**

All information given to Fifth Capital and all recommendations and advice furnished by Fifth Capital to its clients will be kept confidential and will not be disclosed to anyone, except as Fifth Capital may so agree in writing or as may be required to do so by law.

Fifth Capital will collect non-public, personal information about its clients as part of this engagement. This information will be obtained directly from the client and includes details such as the client's date of birth, social security number, financial account numbers and balances, sources and amounts of income, home addresses and telephone numbers.

As part of Fifth Capital's policy, Fifth Capital restricts access to confidential personal information about its clients to those Fifth Capital employees who need to know that information in order to provide products or services to its clients. Fifth Capital maintains physical, electronic, and procedural safeguards to comply with federal standards to guard its clients' confidential personal information.

We may share personal information with unaffiliated service providers such as printing and mailing houses, securities clearinghouses and other entities who may provide services at Fifth Capital's direction.

Our service providers are obligated to keep the personal information we share with them confidential and use it only to provide services specified by Fifth Capital.

Fifth Capital may share information about you with government agencies, other regulatory bodies, and law enforcement officials for tax purposes or to report suspicious transactions.

If you are a former client, these policies apply to you; we treat your information with the same care as we do information about current clients.

**Client Initials:**

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