

# privacy notice.

We at Red Granite Advisors LLC (“Red Granite”) understand and appreciate that our clients are concerned about their privacy and about the confidentiality and security of their information. Trust, privacy, and confidentiality are core principles of Red Granite’s client relationships. Red Granite will take all reasonable steps to protect the privacy of all non-public personal and financial information clients provide to us.

**Non-Public Personal and Financial Information:** Non-public personal and financial information includes information we collect from the client in creating and maintaining the client’s advisory account, such as name, address, age, telephone number, social security or tax identification number, assets, liabilities, income, banking and broker-dealer relationships, and other personal and financial information. It also includes information about the client’s transactions with us, or others, including, but not limited to, the client’s portfolio information, portfolio transactions, parties to transactions, cost basis and sales price information, and other financial information.

**Red Granite’s Disclosure Policy:** Except for the limited purpose of disclosing the names of institutional clients as discussed below, we will only use a client’s non-public personal and financial information to help us service the client’s account. We do not disclose a client’s non-public personal and financial information to anyone, except as required by law. We share selected non-public personal and financial information as part of normal business operations and as part of normal, legal regulatory purposes required by the Internal Revenue Service, Securities & Exchange Commission, and other regulatory and governmental agencies. As part of our normal business operations, we may share a client’s non-public personal and financial information with nonaffiliated companies that perform support services for the client’s account or process the client’s transactions with us, such as the client’s accountants, auditors, attorneys, custodian, and broker.

Items of non-public personal and financial information which we provide to the parties described above include:

- Information we receive from the client in creating and maintaining the client’s account, such as name, address, social security or tax identification number, and size and composition of the client’s account.
- Information about the client’s transactions with us and others and other account data.

Any party receiving this information from Red Granite may use it only to provide required services and as may be permitted under applicable law.

Red Granite employs physical, electronic, and procedural controls to protect our clients’ non-public personal and financial information. By way of example, Red Granite only authorizes access to a client’s non-public personal and financial information and other account information for personnel who need that information to service the client’s account. Red Granite may, however, disclose to prospective clients or others the names of its institutional clients as part of a representative client list. No individual names or any other information regarding our relationship with these institutional clients will be a part of that list.

**Opt-Out:** Institutional clients who prefer that Red Granite not disclose to prospective clients that they are a client of Red Granite may prohibit such disclosure by indicating as much by contacting Red Granite’s General Counsel, Matt MacLean, at 866.727.3200 or [mmaclean@redgranite.com](mailto:mmaclean@redgranite.com).

**Questions:** For any questions about our privacy policy, or for additional copies of this notice, please contact Red Granite’s General Counsel, Matt MacLean, at 866.727.3200.