

## **PRIVACY POLICY NOTICE CHESME CAPITAL MANAGEMENT**

Safeguarding client information is an issue we take seriously at Chesme Capital Management. To affirm our continuing commitment to the proper use of customer information, we have set forth the following Privacy Principles.

1. **Recognition of a Customer's Expectation of Privacy:** We believe 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
2. **Use, Collection, and Retention of Customer Information:** Chesme Capital Management limits the use, collection, and retention of customer information to what we believe is necessary or useful 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 and net worth.
3. **Maintenance of Accurate Information:** We recognize the necessity of maintaining accurate customer records have established procedures to keep such information current and complete.
4. **Limiting Personnel Access to Information:** Access to personal, non-public customer information is limited to those staff members with a business reason to know such information. Staff members are educated on the importance of maintaining the confidentiality of customer information and on these Privacy Principles.
5. **Protection of Information via Established Security Procedures:** Chesme Capital Management recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, we have established appropriate 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, we place strict limits on who receives specific information about customer accounts and other personally identifiable data. Chesme Capital Management may disclose any of the information it collects about customers (or has collected about former customers) to third parties who are not affiliated with Chesme Capital Management under the following circumstances:
  - As directed or authorized by the customer or customer representative;

- As permitted by law, for example, to service providers who provide investment products or services to the customer, in order to effect or settle trades on the client's behalf, in connection with a regulatory audit or examination, or to respond to a subpoena or similar legal process;
- To parties providing services to Chesme Capital Management, such as database service companies or data conversion companies. Such companies shall be contractually prohibited from disclosing or using client information other than to perform the services contracted for.

**7. Disclosure and Notification of Privacy Principles to Customers:** Chesme Capital Management aims to ensure our clients are confident the firm's ability to manage their financial affairs expertly and confidentially. As a result of this commitment, we have developed these Privacy Principles which are readily available to our clients. If we change our Privacy Principles with regard to sharing your confidential information, we are required by law to notify you and provide a revised notice. Customers who have questions about these Privacy Principles or have a question about the privacy of their customer information should contact Chesme Capital Management's Chief Compliance Officer, Chuck Embs, at 517-669-1600 or e-mail him at [chuck@chesme.com](mailto:chuck@chesme.com)