

BAVIELLO INVESTMENT MANAGEMENT, LLC

PRIVACY POLICY

At Baviello Investment Management, LLC, we value the client relationship and focus on the needs and best interests of the client at all times. Our relationship with you begins with the information that you share with us. Federal legislation requires that we communicate our privacy and confidentiality policies with you.

Baviello Investment Management, LLC is committed to safeguarding the confidential information of our clients. In the course of our engagement, we collect financial and personal information to help us understand your current circumstances and to assist you in meeting your personal financial goals. This information may be collected from questionnaires, documents you provide, account transaction history, discussions we have with you or others, or it may be received from other agencies you have authorized us to access. We hold all personal data provided to us in the strictest confidence and require authorization from you before we will discuss your affairs with anyone external to the firm.

We will never disclose information to nonaffiliated third parties (such as brokerage firms, credit card or insurance companies), except as permitted by law, or in carrying out duties for which you retained us. We do not anticipate any change to this policy, and, in the unlikely event that we were to change it, we will contact you prior to such change and give you the option to protect your data.

Our policies with respect to the protection of your personal information are as follows:

- Only those employees who need it to perform their job responsibilities are authorized to have access to personal client information.
- To protect client information, we maintain physical, electronic, and procedural safeguards that comply with federal and state standards. We regularly review our policies and practices, monitor our computer networks and review our procedures in order to help us protect your information.
- For unaffiliated third parties that require access to your personal information (such as a brokerage firm transacting your business or state or federal regulators), we also require strict confidentiality in our agreements with them and expect them to keep this information private.
- We do not provide your information to mailing list vendors or solicitors for any purpose.
- We will maintain your files, with your data, as long as you are a client, and for as long thereafter as required by law, as well as state and regulatory requirements. After this required period of retention, all such information will be appropriately destroyed.
- These policies apply to all current and former clients, and to all current and former employees of Baviello Investment Management, LLC.

If you have any questions as a result of the above, please do not hesitate to contact us at 703-851-5099.