

## Ascentia Capital Partners, LLC Internet Privacy Policy

Ascentia Capital Partners, LLC is committed to maintaining the confidentiality, integrity and security of your personal information and has created the following policy "Privacy Policy" or "Policy" to inform you about the type of information we gather about you when you visit our Website located at [www.AscentiaFunds.com](http://www.AscentiaFunds.com) and use our services.

Please read this document prior to using our Website and/or any of the services we offer. By using this Website and our services, you consent to the data practices described in this Policy. We may make changes to this Privacy Policy by posting an updated version of the Privacy Policy on our Website. It is your responsibility to review the Privacy Policy frequently and remain informed about any changes to it, so we encourage you to visit the Privacy Policy location of our Website often.

### Information we use to provide our services:

If you are a client, we may obtain and provide to you your credit report or other information from third party data suppliers. We may also obtain such information as your name, Social Security Number, mailing address, email address, phone number, date of birth, and credit card or other payment information, as needed to provide our services to you.

We may use this information to:

- Process and administer your order for our services;
- Verify your identity and protect against fraud;
- Provide the services you request; and
- Conduct quality testing and improve our services.

We may disclose this information to our service providers who help us provide our services. We also may disclose this information:

- In accordance with your express instructions or consent of your authorized representative;
- For fraud prevention;
- To carry out transactions requested by you; and
- As otherwise permitted or required by law.

### The Information We Collect:

"Personally Identifiable Information" is any information that may be used to identify an individual, including, but not limited to, a first and last name, home or other physical address, an email address, phone number or other contact information, whether at work or at home.

Ascentia Capital Partners, LLC may request Personally Identifiable Information from you when you register to use our Website and services, and at various other locations on our Website such as message boards, blogs and surveys. If you do not want your Personally Identifiable Information collected, please do not submit it to us. Other nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

Non-personally identifiable information ("non-Personal Information") is information that, by itself, cannot be used to identify or contact you. Examples of this type of information include the type of Internet browser or computer operating system you use, demographic information (your age, gender, income, education, profession, zip code, etc.), the date and time you visited our Website, the pages you accessed, the name of the website from which you linked to our Website and other anonymous data involving your use of our Website. We use this information to analyze trends and gather broad demographic information for aggregate use. This information is not linked to any Personally Identifiable Information.

### How We Collect This Information:

Website usage. We track visitors to our Website. This data allows us to provide the best service possible by helping to ensure the health of the network and services, developing and deploying new business services, researching, improving and maintaining our existing business services and providing customized services to our users.



**Cookies.** When you visit our Website we may utilize cookies, which are small files that are placed on your computer. A cookie contains a string of characters to identify your browser and may be used to help provide a more customized user experience. Most internet browsers are set by default to accept cookies, and if you have opted not to accept cookies, you may experience some functionality issues in using some of the features of our Website.

**Log files.** When you view a website, your browser sends data about your computer system to the web server. Our servers capture this information which may include browser type, time of day, IP address, or cookie and language information.

**Links.** Our servers keep track of links within our Website that you may click on when viewing content. This data is used to better provide content to our users.

**Web Forms and Data You Provide to Ascentia Capital Partners, LLC.** When you complete one of our online forms, we ask for data about you (name, address, email address, etc). This data is designed to help our internal staff better meet your needs. We may use, combine, or track this data with other services and features of Ascentia Capital Partners, LLC to provide a better user experience and increased functionality. For some services, we may provide the opportunity to opt-out of the combining of such data.

**Email submissions.** We may keep records of all email communications sent to Ascentia Capital Partners, LLC. These emails may be processed and used to provide feedback, answer questions, or service some other request.

**Other data.** We collect other non-public personal information concerning you provided by you on applications, contracts or other forms furnished to Ascentia Capital Partners, LLC, or through other interactions you have with Ascentia Capital Partners, LLC.

**How We Use This Information:**

We disclose your information to our service providers who help us provide our services to you.

In addition, with your permission, we also disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

**We do not provide your personal information to mailing list vendors or solicitors.**

We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our company records and your personal records as permitted by law.

We are permitted by law to disclose all of the information we collect, as described above, to the Custodian banks of mutual funds you invest in as needed to process your transactions. Furthermore, we restrict access to your non-public personal information to those persons who require such information to provide services to you. Some services you receive from us are provided through our service providers, which include but are not limited to the custodian banks of mutual funds you invest in. All records containing your non-public personal information are also maintained at the service providers' places of business.

In the event that you hold shares of mutual funds in accounts we manage on your behalf, through a financial intermediary, such as a broker-dealer, bank or trust company, the privacy policy of your financial intermediary would govern how your non-public personal information would be shared with non-affiliated third parties.

We may share aggregated usage data with our support vendors and third-party suppliers that do not provide a method to individually track a user, or when we have been provided your explicit consent to share the information with a third party.

Personally Identifiable Information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, such information may be destroyed.



**Safeguarding your information**

We limit employee access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.) We have a separate form for your signature authorizing us to discuss your financial situation with your accountant, attorney, or others that you may designate.

We maintain a secure office and equipment infrastructure to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

Opting Out of Our Sharing of Your Information. Federal law gives consumers the right to limit some but not all sharing.

Reasons we can share your personal information	Does Ascentia Capital Partners, LLC share?	Can you limit this sharing?
For our everyday business purposes- to process your transactions, maintain your account, and report to credit bureaus	Yes	No
For our marketing purposes- to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes- information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes- information about your credit worthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For non-affiliates to market to you	No	Yes

**Check your Choices**

Check any/all you want to limit:

\_\_\_\_\_ Do not share information about my creditworthiness with your affiliates for their everyday business purposes.

\_\_\_\_\_ Do not allow your affiliates to use my personal information to market to me.

\_\_\_\_\_ Do not share my personal information with nonaffiliates to market their products and services to me.

You may also contact us to limit our sharing of your information by telephone at (775) 828-4200 or by mail at: Ascentia Capital Partners, LLC, 5470 Kietzke Lane, Suite 230, Reno, Nevada, 89511

**Protecting Against Identity Theft**

We take steps to safeguard your information and help protect you from identity theft by never asking for your passwords or account login information via email request, and by utilizing client identification and authentication procedures before initiating transactions. We use a secure transmission connection to our Website. You will see a padlock icon and web address beginning with https to indicate that the site is secure. We also ensure that our employees are trained to safeguard your personal information.

You can help protect your identity and accounts by regularly checking your credit report for unauthorized transactions and activities, and by protecting your personal identification numbers (PINS) and website passwords. We strongly advise you to shred any documents that contain personal information or which request that you open accounts where you do not intend to do business. You should also be aware that we will never request confidential information in a non- secure or unsolicited email communication.

**How To Contact Us Regarding Privacy Concerns:**

If you have any questions or concerns with this policy please feel free to contact us by mail to the following address : Ascentia Capital Partners, LLC, 5470 Kietzke Lane, Suite 230, Reno, Nevada 89511

