

## PERINI CAPITAL, LLC — PRIVACY NOTICE

Information—both confidential and proprietary—plays an important role in the success of our business. We recognize that you have entrusted us with your personal and financial data, and we recognize our obligation to keep this information secure. Maintaining your privacy is important to us, and we hold ourselves to the highest standards in its safekeeping and use. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

To meet your needs with respect to financial products and services, we depend on certain information. In gathering and maintaining this information, we pledge to:

- Collect only the information we need to deliver superior products and services;
- Prevent unauthorized access to your information, including on the Internet;
- Require companies that help us service your account to protect your information in accordance with privacy standards that are at least as strict as our own;
- Maintain control over the confidentiality of your personal information; and
- Update you on our privacy practices at least once a year.

The following policies and procedures protect the privacy of your information, whether you are a current or former investor:

- Categories of Information We May Collect. In the normal course of our advisory business, we may collect the following types of personal information, among others:
  - Information you provide on applications and other forms, including your name, social security number, creditworthiness, address, income, investment experience, account / routing numbers, and other household information;
  - Data about your transactions with us, such as the types of products you have purchased and your account status; and
  - Information gathered on our website through online forms, site visit data and online information-collecting devices known as “cookies.”
- Safeguarding Your Information. We maintain physical, electronic and procedural safeguards that meet or exceed state and federal regulations. We continually update and improve our security standards, procedures and technology to protect against unauthorized access to your confidential information. In addition, we require our non-affiliated service providers to meet privacy standards that are at least as strict as our own.
- How We Use Your Information. We may share your personal information with the following persons:
  - Our personnel who need the information to perform their job responsibilities, such as providing advisory services to you, opening or maintaining an account for you, processing a transaction for your account, marketing products and services to you, responding to a subpoena or a court order, preventing fraud, or complying with an inquiry or investigation by a government agency or credit bureau or as required by any regulation;
  - Our affiliates, as permitted by law (i.e., for routine business administration);
  - Non-affiliated companies, as permitted by law, such as firms that perform services on our behalf, including administering our products and processing your transactions with us;

- Non-affiliated entities, when required by law, such as to responding to a subpoena or a court order, preventing fraud, or complying with an inquiry or investigation by a government agency or credit bureau or as required by any regulation; and
- Service providers and financial institutions with whom we have joint marketing arrangements (i.e., a formal agreement between non-affiliated financial companies that together market financial products or services to you, such as placement agents).

These sharing practices are consistent with Federal privacy laws, and, under such laws, you may only limit our use of your personal information with respect to the following types of information sharing, which we do not engage in:

- Sharing information relating to your creditworthiness with our affiliates for their everyday business purposes;
- Sharing any personal information with our affiliates for them to market to you; and
- Sharing any personal information with non-affiliates for them to market to you.

**We consider privacy your fundamental right and take our responsibility to protect your information seriously. We will adhere to the policies and procedures described above for both current and former investors.**

**If you have any questions with respect to our privacy policy or information sharing practices please call us at 575-725-1978.**