

Notice of Privacy Policy for Soundhaven Capital Management

As required by Regulation S-P Under the Gramm Leach Bliley Act

We value you as a client and take your personal privacy seriously. In order to enhance our ability to provide you with the best service possible, Soundhaven Capital Management (referred to as "we" or "us") collects, uses and shares certain information about you. This policy explains what information we collect and with whom we share it. The practices described in this policy are applicable to all customers, including prospective, current and former customers. The policy also explains how we protect the security and confidentiality of certain customer information.

SAFEGUARDING PRIVACY

We maintain physical, electronic and procedural safeguards that comply with federal standards to ensure the safety of non-public personal customer information. In addition, we require service providers to maintain policies and procedures designed to assure only appropriate access to, and use of, information about customers and to maintain physical, electronic and procedural safeguards that comply with federal standards to guard non-public personal customer information.

INFORMATION WE COLLECT AND SOURCES OF INFORMATION

We may collect information about our clients to help identify you, service and manage your account, and offer services and products you may find valuable. We collect this information from a variety of sources including:

- Information we receive from you on agreements or other forms, such as your name, address, date of birth, social security number and investment information;
- Information about your transactions and experiences with us, such as your account balance, transaction history and investment selections;
- Information you supply in written, telephonic or electronic communications; and
- Information we obtain from third parties regarding their brokerage, investment advisory, consultant, custodial or other relationship with you, such as your account number, account balance and transaction history with them.

INFORMATION WE SHARE

We may disclose all non-public personal information we collect, as described above, to companies that perform services on our behalf (which may be our affiliates), including those that assist us in responding to inquiries, processing transactions, preparing and mailing account statements, and other forms of customer services, provided they use the information solely for these purposes and they enter into a confidentiality agreement regarding the information. We may disclose information regarding you or your account(s) to your attorney, trustee or anyone else who represents you in a fiduciary capacity; to government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries including Federal, State, and Self-Regulatory Organization requirements.

CLOSED ACCOUNTS

If you decide at some point to close your account(s), we will continue to adhere to the privacy policies and practices described in this notice.

QUESTIONS

For questions regarding this policy, or to request a copy, please contact us at: information@soundhavencapital.com.

This policy is updated annually.

Dated January 1, 2020