



## PRIVACY STATEMENT

Agincourt Capital Management, LLC, a Registered Investment Advisory firm, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records may include personal information that we collect from you in connection with any of the services provided by Agincourt Capital Management, LLC. We will not disclose information to nonaffiliated third parties, except as permitted or required by law. We are prohibited under the law from releasing client information without your permission. Our policy with respect to personal information is listed below:

- We limit associate and agent 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 affiliated third parties (such as our parent company Guardian Capital) that require access to your personal information, we require strict confidentiality in our agreements with them and limit access only to those that have a professional reason for this access.
- For unaffiliated third parties that require access to your personal information, including consultants and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators may review firm records as permitted under law. Certain federal and state laws (such as the USA Patriot Act) may require us at times to disclose certain parts of your personal information to government agencies. Additionally, 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.
- The categories of nonpublic personal information that we collect from a client depends upon the scope of the client engagement. It generally includes information about your personal finances, your contact information, financial account numbers and tax identification numbers in order to execute fiduciary responsibility. This information is only shared with third parties in order to execute that responsibility.
- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.
- Personally identifiable information about you will be maintained during the time you are a client, and for the time thereafter that such records are required to be maintained by Federal and state securities laws.
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- It is not a policy of Agincourt Capital Management, LLC to share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service