



Customer Information Privacy Principles

Private Capital Management Associates (PCMA) collects personal and private information from its clients in order to determine the client's specific investment goals and objectives, which will assist in determining how to adequately service the client account based on the investment advisory services provided by PCMA as disclosed in PCMA's Form ADV Part II.

The safeguarding of customer information is an issue we take seriously, and we want to assure all of our customers that whenever information is collected and used, it is done so with discretion. To affirm our continuing commitment to the proper use of customer information, we have set forth the following Privacy Principles, which are designed to guide us in serving the privacy needs of our customers.

1. Recognition of a Customer's Expectation of Privacy: At PCMA, we believe the confidentiality and protection of customer information is one of our fundamental responsibilities. While collecting client personal information is critical to providing quality service, we recognize that one of our most important assets is our customer's trust. Thus the safekeeping of customer nonpublic personal information is a priority for PCMA.

2. Use, Collection, and Retention of Customer Information: PCMA limits the use, collection, and retention of customer information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our customers. Information collected may include, but is not limited to: name, address, telephone number, tax identification number, date of birth, employment status, wills, trusts, mortgages, tax returns, retirement plans, annual income and net worth, spending habits, investment objectives, financial goals, and other records concerning your financial condition and assets.

3. Maintenance of Accurate Information: PCMA recognizes that it must maintain accurate customer records. The above referenced information is collected at the inception of your relationship with PCMA. Thereafter, PCMA will contact you periodically to review your overall account holdings, the services provided, and to ensure the personal/confidential information contained in your file is accurate. PCMA also request that you review any information provided to you related to your advisory account, either by PCMA or the account Custodian, and notify PCMA promptly on the discovery of erroneous information. PCMA will respond to a comment/request to correct inaccurate information immediately. Where applicable, PCMA will contact the account Custodian directly to provide instructions on updating the inaccurate information.

4. Limiting Access to Information: At PCMA, employee access to personally identifiable customer information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer information and on these Privacy Principles. Because of the importance of these issues, all PCMA employees are responsible for maintaining the confidentiality of customer information and employees who violate these Privacy Principles will be subject to disciplinary measures.

5. Protection of Information via Established Security Procedures: PCMA recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, PCMA has established appropriate security standards and procedures to guard any unauthorized access to customer information.

6. Restrictions on the Disclosure of Customer Information: Except as required or permitted by law, we do not share confidential information about you with nonaffiliated third parties. When it comes to sharing customer information with unaffiliated companies, PCMA places strict limits on who receives specific information about customer accounts and other personally identifiable data. PCMA may share information with such companies if they provide a product or service that may benefit our customers. Whenever we do this, we carefully review the company and the product or service to make sure that it provides value to our customers. We share the minimum amount of information necessary for that company to offer its product or service. We may also share information with unaffiliated companies that assist us in providing our products and services to our customers; in a normal course of our business (for example, with government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of a customer.

7. Maintaining Customer Privacy in Business Relationships with Third Parties: If we provide personally identifiable customer information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.

8. Disclosure of Privacy Principles to Customers: PCMA recognizes and respects the privacy expectations of our customers. We want our customers to understand our commitment to privacy related to our use of customer information. As a result of our commitment, we have developed these Privacy Principles, which are made readily available to our customers. Customers who have questions about these Privacy Principles or have a question about the privacy of their customer information should contact **Nikki Chicotel** at 650-712-1000.

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time. Under such circumstances, we will provide you with an updated set of our policies, and will provide adequate time for you to opt out of any information sharing arrangement. Please note that these Privacy Principles, are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our customers.

Rev 03-13-15