

Prime Buchholz Privacy Disclosure Notice

At Prime Buchholz LLC, protecting your privacy is very important to us. We want you to understand what information we collect and how we use it.

We collect and use “nonpublic personal information” in order to provide our clients with investment advisory services as effectively and conveniently as possible. “Nonpublic personal information” is nonpublic information about you that we obtain in connection with providing a financial service to you. We treat nonpublic personal information in accordance with our Privacy Policy.

What Information We Collect and From Whom We Collect It

We may collect nonpublic personal information about you from the following sources:

INFORMATION WE RECEIVE FROM YOU;
INFORMATION ABOUT YOUR TRANSACTIONS WITH US; AND
INFORMATION WE RECEIVE FROM NON-AFFILIATED THIRD PARTIES.

What Information We Disclose and To Whom We Disclose It We do not disclose any nonpublic personal information about you to non-affiliates without your express consent, except as required by regulation or law. We may disclose the nonpublic personal information we collect, as described above, to persons or companies that perform services on our/your behalf and to other financial service providers such as investment management firms, mutual fund companies, custodians, broker dealers, etc. Any disclosures are made only to the extent necessary to facilitate services to you or on your behalf. We do not sell nonpublic personal information.

Information Safeguarding

We restrict access to your nonpublic personal information and only allow disclosures to persons and companies as required by regulation or law to assist in providing services to you. We have implemented and maintain a personal information data protection policy, which provides for physical, electronic, and procedural safeguards to protect your nonpublic personal information. Some of the safeguards implemented on your behalf include: systems and network protections designed to be secure, including encryption technologies; unique user names, passwords and access controls; employee and vendor confidentiality requirements, and unique client codes; ongoing monitoring and due diligence of service providers with access to client information; and storage and disposal of records containing nonpublic personal information which are designed to be secure.

Data Security Incidents and Notification

Prime Buchholz maintains a written incident response program designed to detect, respond to, and recover from unauthorized access to or use of client information. If we become aware of unauthorized access to or use of sensitive client information, or reasonably determine that such access or use is likely

to have occurred, we will provide notice to affected individuals as soon as reasonably practicable and no later than required by applicable law. Such notices may include information about the incident and steps you can take to help protect yourself.

For additional information on our Privacy Policy, please contact privacypolicy@primebuchholz.com