



PRIVACY POLICY

Introduction

BBAE Advisors, LLC (“BBAE”) takes measures to ensure that the use and disclosure of your private personal information are consistent with applicable law. Our Consumer Information Privacy Policy (“Privacy Policy”) explains what nonpublic personal information we collect, why BBAE collects it, how BBAE protects your nonpublic personal information, and how and why, in certain cases, BBAE shares such information amongst BBAE Advisors, LLC or with other parties. Our Privacy Policy may be amended from time to time. It applies to nonpublic personal information collected or used when BBAE offers investment products or services to individuals for personal, family, or household purposes. This disclosure is made on behalf of BBAE and listed in the “Application of Privacy Policy for BBAE Advisors, LLC” section below. Our Privacy Policy applies only to individual or institutional clients of BBAE Advisors, LLC who have a direct relationship with BBAE Advisors, LLC. If you own BBAE investment products or receive BBAE services in the name of a third-party broker-dealer, investment adviser, or other financial service provider, that third party’s privacy policies may apply to you.

Information That We Collect and May Disclose

BBAE collects information from and about you to provide the superior level of service that you expect. Nonpublic personal information about you may include your name, mailing address, e-mail address, tax identification number, age, account information, investment amounts in our companies, marital status, number of dependents, assets, debts, income, net worth, employment history, financial statements, beneficiary information, personal bank account information, credit history information, broker-dealer, financial advisor, IRA custodian, account joint owners and other similar parties, BBAE’s investment products and services you purchase, your account balance or transactional history with BBAE, the fact that you are or have been an investor in a Firm-sponsored investment, and particulars related to any such investment. Specific examples of personal information that BBAE may collect and may disclose to affiliates and certain third parties include:

- Information BBAE receives from you on applications, subscription agreements, or other forms. Examples include your name, mailing address, and e-mail address.
- Information about your transactions with BBAE, its affiliates, and others such as account balances, payment history, account activity, and financial statements.
- If you visit BBAE’s Internet website, www.bbae.com.
- Information obtained from others, such as credit reports from consumer credit reporting agencies.

How We Use and Disclose Information

BBAE and third-party service providers work together to provide a variety of investment products and services, and they may need to share some or all nonpublic personal information collected on you to maintain an efficient and effective network of products and services. BBAE believes that by sharing information about you and your accounts among our affiliates and



partners, BBAE is better able to serve your investment needs and to suggest services or educational materials that may be of interest to you. The responsible use and disclosure of the nonpublic personal information BBAE collects are crucial to our ability to provide our clients with the type of products and services they expect, and may occur under a variety of different circumstances. For example, BBAE may:

- Use your personally identifiable information internally for the purposes of analyzing our business, which may include analyzing your information, matching your information with the information of others, processing services, maintaining accounts, resolving disputes, preventing fraud, and verifying your identity.
- Disclose your personally identifiable information when required by law, such as requests for personal information in connection with a judicial, administrative, or investigative matter.
- Use and disclose your personally identifiable information on an aggregate basis. This means that BBAE combines parts of your information with parts of the information from our other users without including your name, complete telephone number, complete e-mail address, or your street address, in the combination. An example of how BBAE uses aggregate information includes determining and disclosing demographic information such as the average income of investors in our products.

Sharing Amongst BBAE Affiliates and Nonaffiliated Service Providers

BBAE may share your personally identifiable information among BBAE affiliates engaged in investment or other related financial service activities. Examples might include customer-initiated service requests, establishing and managing your investor accounts, completing your investor transactions, and sharing information with parties acting at your request and on your behalf, such as your broker-dealer, financial advisor, joint owners, and IRA custodian.

Sharing With Nonaffiliated Service Providers

BBAE may disclose your personal information to nonaffiliated service providers who perform business functions on our behalf, which may include marketing of our own investment products and services, check printing, and data processing. Nonaffiliated third-party service providers often aid us in the efficient and effective delivery of services, and there may be circumstances where it is necessary to disclose nonpublic personal information BBAE collects to such parties. However, before BBAE discloses nonpublic personal information to a nonaffiliated party, we require them to agree to keep our investor information confidential and secure and to use it only as authorized by us. Also, BBAE will only share your nonpublic information with nonaffiliated third parties under circumstances not covered by state or federal law “opt-out” notice exceptions, such as servicing a financial product or service authorized by the customer, resolving consumer disputes, and protecting against potential fraud or unauthorized transactions. Should this policy ever change in the future, you will be given adequate notice and the option to “opt-out” of such disclosure.

BBAE may also disclose the following information to companies that perform marketing services on our behalf or to other financial institutions with which BBAE has joint marketing agreements:

- Information BBAE receives from you on applications or other forms, such as your



name, address, social security number, assets, and income.

- Information about your transactions with us, our affiliates, or others, such as your payment history, and parties to the transactions.
- Information BBAE receives from a consumer reporting agency, such as your creditworthiness and credit history.

BBAE requires all joint marketers to have written contracts with us that specify appropriate use of your personal information, require them to take steps to safeguard your personal information, and prohibit them from making unauthorized or unlawful use of your personal information. BBAE does not share, sell, or rent your personal private information with outside marketers who may want to offer you their own products and services.

How BBAE Protects Your Information

BBAE maintains a comprehensive information security program designed to ensure the security and confidentiality of customer information, protect against threats or hazards to the security of such information, and prevent unauthorized access. This program includes:

- Procedures and specifications for administrative, technical, and physical safeguards.
- Security procedures related to the processing, storage, retention, and disposal of confidential information.
- Programs to detect, prevent, and when necessary, respond to attacks, intrusions, or unauthorized access to confidential information.
- Restricting access to customer information to employees who need to know that information to provide products and services to you, and appointing specific employees to oversee our information security program.

Availability of Our Privacy Policy

BBAE will provide notice of our Privacy Policy annually, as long as you maintain an ongoing relationship with us.

Notification of Changes to Our Privacy Policy

If BBAE decides to change our Privacy Policy, BBAE will post those changes on the www.bbae.com website so our users and investors are always aware of what information BBAE collects, uses, and discloses. If at any point we decide to use or disclose your personally identifiable information in a manner different from that stated at the time it was collected, BBAE will notify you in writing. BBAE will otherwise use and disclose a user's or an investor's personally identifiable information in accordance with the Privacy Policy that was in effect when such information was collected.

Change in Control

If BBAE experiences a "change in control" (defined below), then BBAE may amend our information practices as described in this Privacy Policy. BBAE will disclose your personally identifiable information to the company or other legal entity that succeeds the company subject to the change in control or the operation of the website. The privacy policy of the



succeeding legal entity will then govern the personally identifiable information that the applicable firm had collected from you under this Privacy Policy. However, if applicable law prohibits the succeeding legal entity's privacy policy from governing your personally identifiable information, then this Privacy Policy shall continue to govern. "Change in control" means any of the following events:

- A reorganization, merger, consolidation, acquisition, or other restructuring involving all or substantially all of BBAE's voting securities and/or assets, by operation of law or otherwise.
- Insolvency.
- A general assignment for the benefit of creditors. The appointment of a receiver.
- The filing of a bankruptcy or insolvency proceeding. The liquidation of assets.

Application of Privacy Policy for BBAE

This Privacy Policy applies to the following companies: BBAE Advisors LLC and their respective affiliates and all other funds or entities created in the future that offer investment products or services.