

## *PRIVACY POLICY*

3D Asset Management LLC (herein “3D”) is committed to client confidentiality and to protect your privacy. The following information is provided, as required by law, to help you understand our privacy policy and how we will handle and maintain confidential personal information as we fulfill our obligations to protect your privacy. “Personal information” refers to the nonpublic financial information obtained by 3D Asset Management in connection with carrying out our services.

### **Information We Collect**

3D collects personal information as part of our relationship with you to provide client services and fulfill legal and regulatory requirements. The type of information we collect may include:

Information 3D receives from you on applications and other forms (such as name, address, date of birth, Social Security number and investment holdings);

Information about your transactions with us, or others as provided by others to facilitate those transactions; and,

Information you provide 3D directly about your personal finances or personal circumstances or which 3D may receive from brokerage statements or other information you authorize 3D to receive.

### **Information Disclosed in Administering Products and Services**

3D will not disclose personal information about current or former clients to nonaffiliated third parties except as permitted or required by law. 3D does not sell any personal information about you to any third party. 3D will not disclose personal information without your authorization, except as required or permitted by law. 3D may disclose information it collects about customers or former customers to third parties who are not affiliated with 3D under the following circumstances:

As directed or authorized by the customer;

To corresponding solicitors as directed by the customer;

To providers of other services and products used by the customer (custodian, etc.), in order to effect or settle transactions on the customer's behalf,

As required in a regulatory audit or examination or to respond to a subpoena or similar legal process; and,

To persons and organizations contracted by 3D to provide services in support of our mission to service our customers. These parties include technology vendors, broker dealers/custodians, record-keepers and others. Any party so contracted will be prohibited, in their contract with 3D, from disclosing or using client information other than to perform the services contracted for.

### **Procedures to Protect Confidentiality and Security of Your Personal Information**

3D Asset Management has procedures in place that limit access to personal information to those employees who need to know such information in order to perform business services. In addition, 3D maintains physical, electronic and procedural safeguards to guard your nonpublic personal information.

3D will update its policy and procedures when necessary to ensure that your privacy is maintained and that 3D conducts business in a way that fulfills our commitment to you. If 3D makes any material changes in its privacy policy, we will make that information available to clients through our Web site and/or other communications. Any questions concerning 3D's privacy policy should be directed to the Chief Compliance Officer at (860) 291-1998.