CLOUD CAPITAL
MANAGEMENT

Privacy Policy

The Cloud Capital Management ("Advisor") Privacy Policy follows and is applicable to current and former clients. Throughout the policy, Advisor refers to information that personally identifies clients or client accounts as "personal information." Advisor collects personal information in the normal course of business to better manage and serve Clients. (1) Advisor collects Clients' information (that they provide Advisor) when they open an Account. The information Advisor collects may include the Client's name, address, phone number, e-mail address, social security number, and information about the Client's interests, investments, financial goals and investment experience. (2) Once a Client opens an Account with Advisor, personal information is collected and maintained about the Client's transaction history, positions, and account balances. Advisor may include the Client's name and other data in internal data bases and lists that reflect the client's activities with Advisor.

Advisor uses personal information to fulfill regulatory and audit obligations and to help Advisor deliver the best possible client service. Advisor does not sell personal information to anyone. Advisor does not disclose personal information to third parties, unless one of the following limited exceptions applies: (1) Advisor discloses personal information to companies that help us process or service client transactions or Account(s), including, but not limited to the Custodian, data aggregation software, customer management software, etc. Advisor has contracts with these companies that prohibit them from using personal information for their own purposes. (2) Advisor may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law, for example: to cooperate with regulatory or law enforcement authorities, to resolve consumer disputes, to perform credit/authentication checks, or for institutional risk control.

> ***Outside of these exceptions, we will not share personal information with third parties unless the Client specifically requests us to do so.***

Advisor protects the confidentiality and security of personal information. (1) Companies Advisor hired to provide support services are not allowed to use personal information for their own purposes. Advisor limits their use of personal information to performance of the specific service we have requested. (2) Advisor restricts access to personal information to employees and agents for business purposes only. (3) All employees are trained and required to safeguard such information. (4) Advisor maintains physical, electronic, and procedural safeguards for personal information.

Advisor continues to evaluate our efforts to protect personal information and make every effort to keep personal information accurate and up-to-date. If Clients identify any inaccuracy in their personal information, or need to make a change to that information, they should contact Advisor. If, at any time in the future, it is necessary to disclose our Clients' personal information in a way that is inconsistent with this policy, advance notice of the proposed change will be provided to Client, so they can opt out of such information sharing.

Clients with any questions or concerns may call Advisor at 801.910.4278.

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