

Seahorse Financial Advisers Privacy Pledge and Corporate Privacy Policy

Client Privacy Promise. Seahorse Financial Advisers respects your privacy, and we will not share your personal non-public information that we may collect with any other person unless you so direct us.

Information We Collect. Seahorse Financial Advisers collects non-public personal information such as your name, age, address, marital status, social security number and employment, wealth, income, expenditures, investment, and tax information. You have provided this information to us to assist us in formulating financial objectives and managing your financial affairs.

Basic Pledge: We will not share your personal non-public information that we may collect with any other person unless you so direct us. Your personal non-public information will be given to your brokerage house in the course of their servicing your account, and to our data manager. Each such institution maintains its own policies and protections of your personal non-public information. If you ask us to share your non-public personal information, such as with your accountant, lawyer, or estate planner, we of course will do so to send information to your accountant.

Government Requirements. Seahorse Financial Advisers will share information when we are so required by law, such as in examinations by regulators.

Confidentiality Safeguards Seahorse Financial Advisers simply does not release your personal information except as noted above. We do not release your personal information for marketing or advertising purposes.

The Internet and Privacy. Access to your brokerage account, by you or by us, is often over the Internet. Brokerage houses strive to maintain "secure" web sites, and the security of brokerage house web sites is the responsibility of the broker. We advise that you have Internet firewall, virus, worm, and other confidentiality safeguards built into your computer system and maintained current. Although imperfect, these protections are advisable. We recommend that you safeguard your personal information in your dealings with vendors and other advisers, and in your use of the Internet. In addition, we do not consider any unencrypted e-mail containing personal financial information as secure. We will not send forms containing your social security number, or any tax form, by unencrypted e-mail, and we ask that you do the same. If you suspect a breach of your privacy, please advise us immediately so we may take steps to minimize the impact upon you.

Theft of Identity Monitoring. We strongly advise that you enroll in a theft of identity monitoring program.

Custody of Assets and Preservation of Account records. Your investment assets are held in custody by the broker for your account. We can enter trades in your account through the investment manager trading access provided by your broker, but we will not log in to your account using your log-in credentials nor keep a record of these credentials. We do not take custody nor exercise any power – such as disbursement authority – which might be construed as custody. Further, your broker maintains your original account records. Our records are duplicates of the broker's records and the records the broker sends to you.

Security of your Records in Our Possession and Action in Event of Breach. We maintain procedures to ensure physical security of records in our possession and electronic security of records we maintain on our computer systems. In the event of breach of our security, we will inform you while we work with our consultants to determine the scope of, and promptly remedy, such breach. The custodian broker on your account and the data manager we retain to assist in compiling and reporting your accounts to you each maintain, and are responsible for, the security of their records and procedures. We recommend and we retain only large, established and highly reputable custodian brokers and data managers, but ultimately we rely on them to maintain effective data security practices and procedures.

Federal and State Laws. Our privacy policy will be updated periodically to conform to applicable Federal and State laws, and all such laws apply to our privacy policy and are automatically incorporated into it.