

Compliance Manual

Exhibit D: Privacy Policy Notice

Rev. [November 2018]

FACTS	WHAT DOES SAGE MOUNTAIN ADVISORS DO WITH YOUR FINANCIAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
What?	<p>The types of personal information we collect, and share depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social Security number and assets ▪ Account balances and transaction history ▪ Wire transfer instructions and risk tolerance <p>When you are <i>no longer</i> our customer, we may continue to share your information as described in this notice.</p>	
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons SMA chooses to share; and whether you can limit this sharing.	
Reasons we can share your personal information		
Does SMA share?	Can you limit this sharing?	
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations.	Yes	No
For our marketing purposes – to offer our products and services to you. We may use your account performance returns and other statistical information about your account on an anonymous basis only in our marketing materials.	Yes	Yes
For joint marketing with other financial companies	No	Not Applicable
For our affiliates' everyday business purposes- information about your transactions and experiences	No	Not Applicable
For our affiliates' everyday business purposes- information about your creditworthiness	No	Not Applicable
For our affiliates to market to you	No	Not Applicable
For nonaffiliates to market to you	No	Not Applicable
To limit our sharing	<ul style="list-style-type: none"> ▪ Call (404) 795-8361 ▪ Visit us online: www.sagemountainadvisors.com <p>Please note: If you are a <i>new</i> customer, we can begin sharing your information [30] days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>	

Compliance Manual

Questions?

Call (404) 795-8361 or go to www.sagemountainadvisors.com

Page 2

Who we are

Who is providing this notice?

Sage Mountain Advisors

What we do

How does SMA protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and building.

How does SMA collect my personal information?

We collect your personal information, for example, when you:

- Open an account
- Deposit money
- Seek advice about your investments
- Enter into an investment advisory contract
- Tell us about your investment or retirement portfolio or earnings

We also collect your personal information from other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes – information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. [See below for more on your rights under state law.]

Definitions

Affiliates

Companies related by common ownership and control. They can be financial and nonfinancial companies.

- *SMA does not currently have affiliates.*

Nonaffiliates

Companies not related by common ownership and control. They can be financial or nonfinancial companies.

- *SMA does not share with non-affiliates so they can market to you.*

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or service to you.

- *SMA does not jointly market any products or services.*