

# Compliance Manual

## Exhibit D: Privacy Policy Notice

Rev. [October 2024]

<b>FACTS</b>	<b>WHAT DOES SAGE MOUNTAIN ADVISORS DO WITH YOUR FINANCIAL INFORMATION?</b>																									
<b>Why?</b>	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.																									
<b>What?</b>	<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"> <li>▪ Social Security number and assets</li> <li>▪ Account balances and transaction history</li> <li>▪ Wire transfer instructions and risk tolerance</li> </ul> <p>When you are <i>no longer</i> our customer, we may continue to share your information as described in this notice.</p>																									
<b>How?</b>	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.																									
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; text-align: left;">Reasons we can share your personal information</th> <th style="width: 25%; text-align: center;">Does SMA share?</th> <th style="width: 25%; text-align: center;">Can you limit this sharing?</th> </tr> </thead> <tbody> <tr> <td><b>For our everyday business purposes –</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations.</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> <tr> <td><b>For our marketing purposes –</b> 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.</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td><b>For joint marketing with other financial companies</b></td> <td style="text-align: center;">No</td> <td style="text-align: center;">Not Applicable</td> </tr> <tr> <td><b>For our affiliates' everyday business purposes-</b> information about your transactions and experiences</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Not Applicable</td> </tr> <tr> <td><b>For our affiliates' everyday business purposes-</b> information about your creditworthiness</td> <td style="text-align: center;">No</td> <td style="text-align: center;">Not Applicable</td> </tr> <tr> <td><b>For our affiliates to market to you</b></td> <td style="text-align: center;">No</td> <td style="text-align: center;">Not Applicable</td> </tr> <tr> <td><b>For nonaffiliates to market to you</b></td> <td style="text-align: center;">No</td> <td style="text-align: center;">Not Applicable</td> </tr> </tbody> </table>			Reasons we can share your personal information	Does SMA share?	Can you limit this sharing?	<b>For our everyday business purposes –</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations.	Yes	No	<b>For our marketing purposes –</b> 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	<b>For joint marketing with other financial companies</b>	No	Not Applicable	<b>For our affiliates' everyday business purposes-</b> information about your transactions and experiences	No	Not Applicable	<b>For our affiliates' everyday business purposes-</b> information about your creditworthiness	No	Not Applicable	<b>For our affiliates to market to you</b>	No	Not Applicable	<b>For nonaffiliates to market to you</b>	No	Not Applicable
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<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>▪ Call (404) 795-8361</li> <li>▪ Visit us online: <a href="http://www.sagemountainadvisors.com">www.sagemountainadvisors.com</a></li> </ul> <p><b>Please note:</b> 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>No mobile information will be shared with third parties/affiliates for marketing or promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.</p> <p>However, you can contact us at any time to limit our sharing.</p>																									

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Questions?

Call (404) 795-8361 or go to [www.sagemountainadvisors.com](http://www.sagemountainadvisors.com)

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## 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.*