

PRIVACY NOTICE

SANDHILL INVESTMENT MANAGEMENT IS COMMITTED TO PROTECTING THE CONFIDENTIALITY AND SECURITY OF YOUR PRIVATE INFORMATION. THIS NOTICE IS PROVIDED TO HELP YOU UNDERSTAND HOW WE SAFEGUARD YOUR PRIVACY.

IN ORDER TO PROPERLY SERVICE YOUR ACCOUNT WE MUST OBTAIN SOME NONPUBLIC PERSONAL INFORMATION ABOUT YOU. THE TYPES OF INFORMATION WE MAY NEED TO OBTAIN FALL INTO THE FOLLOWING CATEGORIES:

- INFORMATION THAT WE RECEIVE FROM YOU VERBALLY AND/OR ON APPLICATIONS OR OTHER FORMS; SUCH AS, NAMES, ADDRESSES, PHONE NUMBERS, SOCIAL SECURITY NUMBERS, INVESTMENT OBJECTIVES, AND ACCOUNT VALUES.
- INFORMATION ABOUT YOUR TRANSACTIONS WITH US.

WE DO NOT DISCLOSE ANY NONPUBLIC PERSONAL INFORMATION (“NPI”) ABOUT OUR CUSTOMERS OR FORMER CUSTOMERS TO ANY NONAFFILIATED THIRD PARTIES, EXCEPT IN THE FOLLOWING CIRCUMSTANCES:

- AS NECESSARY TO PROVIDE THE SERVICE THAT THE CLIENT HAS REQUESTED OR AUTHORIZED, OR TO MAINTAIN AND SERVICE THE CLIENT’S ACCOUNT;
- AS REQUIRED BY REGULATORY OR LAW ENFORCEMENT OFFICIALS WHO HAVE JURISDICTION OVER SANDHILL INVESTMENT MANAGEMENT, OR AS OTHERWISE REQUIRED BY ANY APPLICABLE LAW;
- TO PROTECT THE CONFIDENTIALITY AND SECURITY OF FIRM RECORDS PERTAINING TO THE CONSUMER, SERVICE, PRODUCT, OR TRANSACTION; AND
- TO THE EXTENT REASONABLY NECESSARY TO PREVENT FRAUD AND UNAUTHORIZED TRANSACTIONS

ACCESS TO YOUR PERSONAL INFORMATION IS RESTRICTED TO THOSE EMPLOYEES THAT NEED TO KNOW THAT INFORMATION TO PROVIDE SERVICES TO YOU. WE MAINTAIN PHYSICAL, ELECTRONIC AND PROCEDURAL SAFEGUARDS TO COMPLY WITH FEDERAL STANDARDS TO PROTECT YOUR PERSONAL INFORMATION.