

PRIVACY NOTICE

March 2023

We recognize the importance of protecting your privacy. We have policies in place to maintain the confidentiality and security of your nonpublic personal information. This notice is designed to help you understand the information that we collect from you and how we use that information with respect to your account. Our privacy policy also protects you when you are no longer our client.

In the normal course of business, we may collect various types of nonpublic personal information:

Information that you provide during our discussions or in your investment management agreement, your subscription agreement, and other forms, including your name, address, income, and other financially related information

Data about your transactions with us, such as the types of investments you have made and your account status

Without prior notice to you, no nonpublic personal information that we receive from you will be shared with nonaffiliated third parties that are not our service providers. In the normal course of business, we may disclose the kinds of nonpublic personal information described above to nonaffiliated third-party service providers involved in servicing and administering products and services on our behalf. These service providers include but are not limited to account custodians, broker-dealers, prime brokers, accountants, auditors, and legal advisors. In addition, we may disclose nonpublic personal information as required by law, such as to respond to a subpoena or to prevent fraud. You may also grant us permission to speak with some of your relatives about your financial affairs, which may involve our providing these relatives with nonpublic personal information about you.

We restrict access to nonpublic personal information about you to our employees and agents who need to know the information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to protect your nonpublic personal information. In addition, if we choose to dispose of any nonpublic personal information that we are not legally bound to maintain, we will do so in a manner that reasonably protects the information from unauthorized access.

This privacy notice relates to Bourgeon Capital Management, LLC. If you have any questions about our privacy policies, please contact John A. Zaro III at (203) 280-1170.