

**EFG CAPITAL ADVISORS, INC.
PRIVACY POLICY**

EFG Capital Advisors, Inc. (“EFGCA”), which includes for purposes of this policy, EFG Investment Services, Inc., recognizes and respects the privacy concerns of its customers. EFGCA does not disclose any nonpublic personal information about its clients or former clients to any third parties, except as required by law.

All nonpublic personal information about you (which includes, but is not limited to, your name, address, account balance, redemption or withdrawal history, assets and/or income) is gathered from the following sources:

- Information received from client on account applications, agreements, questionnaire’s or other forms;
- Information about client’s transactions with EFGCA;
- Information received from client in written, telephonic, or electronic communications with EFGCA;
- Information received from third party public sources and consumer reporting agencies.

In order to service client accounts and effect client transactions, EFGCA may provide client’s personal information to affiliates and financial service providers that assist in servicing the account and have a need for the information. Examples would include, but are not limited to, a broker, fund administrator, accountants and auditors, and legal counsel. Each of the foregoing will only be provided the information on a need to know basis. The EFGCA does not otherwise provide information about clients to outside firms, organizations or individuals except as required by applicable law.

EFGCA restricts access to nonpublic personal information about clients to its employees who need to know the information in order to provide product and services to clients. EFGCA will maintain physical, electronic and procedural safeguards that comply with applicable federal standards to guard client’s personal information.

In the event that prospective clients invest with EFGCA through a financial intermediary, including but not limited to, a broker-dealer, bank or trust company, the privacy policy of the financial intermediary will govern how client’s nonpublic information will be shared by that entity with non-affiliated third parties.

For clients that have accounts custodied with EFGCA’s affiliate EFG Bank, please review the Bank’s policy set forth below. If you would like information on the privacy policy of other financial intermediaries that handle your account(s), please contact those institutions directly, or call EFGCA for additional information.

EFG Bank Customers

EFG Bank undertakes that no confidential Account Holder information will be made available to unauthorized parties without the Account Holder’s express consent. Excluded from this undertaking are disclosure obligations towards authorities, state entities, Stock Exchanges, auditors and branches and subsidiaries of the Bank as required by applicable Swiss and foreign laws. In particular the Account Holder recognizes that in jurisdictions where the law or practice may require that the Account Holder’s or the beneficial owner’s identity be revealed in the course of criminal or other investigations, the Bank shall release such information but will endeavor to notify the Account Holder, unless such notification is prohibited in law. The Account Holder is aware that certain foreign financial market laws and regulations may require the full disclosure of the Account Holder’s and/or the beneficial owner’s identity as investors; the Account Holder authorizes the Bank to disclose this information and acknowledges that in disclosing it, the Bank is not violating any secrecy laws.