

Sweetbay Capital Management, LLC

Privacy Notice

Investment Advisers are required by law to inform their clients of their policies regarding privacy of client information. Such laws require us to tell you how we collect, share, and protect your personal information.

INFORMATION COLLECTED

The categories of non-public personal information about you that Sweetbay Capital Management, LLC (“Sweetbay”) collects include your Social Security or taxpayer identification number, address, date of birth and information about your personal finances. In addition, Sweetbay collects information about transactions between you and third parties, such as mutual fund companies or custodians, including transactional information about your accounts, such as your account balances and transaction history.

Sweetbay requires this information in order to administer its business and provide its investment management and financial planning services.

INFORMATION DISCLOSED

Sweetbay does not disclose any nonpublic personal information about its clients or former clients to anyone, except as permitted by law. Sweetbay does not disclose your personal information to any third party for the purpose of allowing that party to market other products to you. In accordance with privacy laws, Sweetbay may disclose all of the information it collects, as described above, to certain nonaffiliated third parties such as attorneys, accountants, auditors and persons or entities that are assessing Sweetbay’s compliance with industry standards. Sweetbay enters into contractual agreements with all nonaffiliated third parties to prohibit such third parties from disclosing or using the information other than to carry out the purposes for which Sweetbay discloses the information.

CONFIDENTIALITY AND SECURITY

Sweetbay restricts access to nonpublic personal information about you to those employees who need to know that information in order to administer the firm’s business or provide you with investment management and financial planning services. Sweetbay maintains physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.