

Apella Capital, LLC
Client Personal Information Privacy Principles

We want to assure all of our clients that the safeguarding of client's personal information is an issue we take seriously at Apella Capital, LLC and affiliates ("Apella"). To affirm our continuing commitment to our proper use of client's personal information, we have adopted the following Privacy Principles. It is these Privacy Principles that guide us in safeguarding our client's personal information. Please read these Privacy Principles carefully before sharing with us any personal information described below. When you provide us with personally identifiable information, you are acknowledging that the information will be subject to the terms of this Privacy Policy.

1. **Recognition of a Client's Expectation of Privacy:** At Apella we believe the confidentiality and protection of client's personal information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our clients' trust. Thus, the safekeeping of client personal information is a priority for Apella.
2. **Use, Collection, and Retention of Client Personal Information:** Apella limits the use, collection, and retention of client personal information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our clients. Information collected may include, but is not limited to: name, address, telephone number, email address, tax identification number, date of birth, bank account, brokerage account, employment status, annual income and net worth. The client personal information is provided to us by clients who choose to engage us to perform services on their behalf.
3. **Maintenance of Accurate Information:** Apella recognizes that it must maintain accurate client records. Therefore, Apella has established procedures to maintain the accuracy of client personal information and to keep such information current and complete. These procedures may include asking clients to respond to requests to correct inaccurate information in a timely manner.
4. **Limiting Employee Access to Personal Information:** At Apella, employee access to client personal information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of client personal information and to comply with these Privacy Principles. Because of the importance of these issues, all Apella employees are responsible for maintaining the confidentiality of client personal information and employees who violate these Privacy Principles will be subject to disciplinary measures.
5. **Protection of Client Personal Information via Established Security Procedures:** Apella recognizes that a fundamental element of maintaining effective procedures regarding the safeguarding of client personal information is to provide reasonable protection against the unauthorized access to client personal information. Therefore, Apella has adopted appropriate administrative, physical, and technological security standards and procedures to guard against any unauthorized access to client personal information.
6. **Restrictions on the Disclosure of Client Personal Information:**
 - a. When it comes to sharing client personal information with affiliated or unaffiliated parties, Apella places strict limits on who receives specific client personal information and such sharing is done in accordance with Section 8, 11 and this Section 6(a). Apella may share client personal information with such affiliated or unaffiliated third party if they provide a product or service that may benefit our clients. Whenever we do this, we carefully review the third party and the product or service to make sure that it provides value to our clients.

We share the minimum amount of information necessary for that firm to offer its product or service. We may share client personal information with affiliated or unaffiliated third parties that assist us in providing our products and services to our clients; disclosures made in the course of processing authorized transactions and servicing accounts; in the normal course of our business; made at the direction or with consent of the client; to protect against actual or potential fraud; to persons who are assessing the firm's compliance risk and with the firm's attorneys, accountants, auditors and advisers; in connection with acquisition and sales; to assert legal rights or defense against legal claims; to comply with applicable laws or regulations; and to comply with a valid legal process such as a search warrant, subpoena or court order, and/or to investigate suspected fraud.

- b. With the exception of those situations outlined in 6(a), 8 and 11, Apella does not share client personal information with unaffiliated third parties. If Apella receives a request for such client personal information that goes beyond the scope of the items listed in 6(a), then it is Apella's policy to contact the client for permission. The client can decline and opt out at this time.
7. **Maintaining Client Privacy in Business Relationships with Affiliated or Unaffiliated Third Parties:** If we provide client personal information to an affiliated or unaffiliated third party with which we have a business relationship, we will provide to the third party only on the condition that the third party keep such information confidential, consistent with the conduct of our business relationship.
 8. **Consumer Report Information:** The nature of our business seldom requires the firm to handle consumer report information. However, when applicable, Apella shall take reasonable measures, when disposing of consumer report information, to protect against unauthorized access or use of such information. Apella shall ensure that consumer report information shall only be provided to necessary service providers who can properly dispose of such information.
 9. **Non-Personally Identifiable Information:** In addition to client personal information, we may collect non-personally identifiable information, such as what type of browser used or information about a computer or IP address. We may then link this non-personally identifiable information for any number of reasons, including, but not limited to, working with business partners and promoting and improving our business, products or services.
 10. **Information over the Internet:** Client personal information may be accessed and transferred over the Internet and Apella does not operate or control the internet and that: (i) viruses, worms, trojan horses, or other undesirable data or software; or (ii) unauthorized users (e.g., hackers) may attempt to obtain access to and damage client personal information, or Site, computers, or networks.
 11. **Sale of Business:** Information about our clients might be disclosed as part of any merger, acquisition, debt financing, sale of company assets, as well as in the event of insolvency, bankruptcy, or receivership in which client personal information could be transferred to third parties as one of the business assets of the company.
 12. **Disclosure of Privacy Principles to Clients:** Apella recognizes and respects the privacy expectations of our clients. We want our clients to understand our commitment to privacy in our use of client information. As a result of our commitment, we have developed these Privacy Principles, which are made readily available to our clients. Clients who have questions about these Privacy Principles or have a question about the privacy of their client information should call John Mooney at 860-785-2260 or e-mail him at jmooney@apellacapital.com.

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time without prior notice. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify, supersede or amend any written agreements we have with our clients.