

## Privacy Policy

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Effective: September 25, 2017

### Our Commitment to You

LEVATUS LLC (“LEVATUS” or the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”). LEVATUS does not collect personal non-public information through this website; however, the Advisor may collect information from you on application forms, agreements, profile worksheets, and other documents received or processed in relation to services we provide. We also may collect information from other sources as disclosed below.

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. LEVATUS (also referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

LEVATUS does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

|                                                    |                                 |
|----------------------------------------------------|---------------------------------|
| Driver’s license number                            | Date of birth                   |
| Social security or taxpayer identification number  | Assets and liabilities          |
| Name, address and phone number(s)                  | Income and expenses             |
| E-mail address(es)                                 | Investment activity             |
| Account information (including other institutions) | Investment experience and goals |

### What Information do we collect from other sources?

|                                               |                                                     |
|-----------------------------------------------|-----------------------------------------------------|
| Custody, brokerage and advisory agreements    | Account applications and forms                      |
| Other advisory agreements and legal documents | Investment questionnaires and suitability documents |
| Transactional information with us or others   | Other information needed to service account         |

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

**How do we share your information?**

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

| Basis For Sharing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Do we share? | Can you limit? |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------------|
| <p><b>Servicing our Clients</b><br/>                     We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.</p>                     | Yes          | No             |
| <p><b>Marketing Purposes</b><br/>                     LEVATUS does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where LEVATUS or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b></p> | No           | Not Shared     |
| <p><b>Authorized Users</b><br/>                     Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).</p>                                                                                                                                                                                                                                                                                                                            | Yes          | Yes            |
| <p><b>Information About Former Clients</b><br/>                     LEVATUS does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.</p>                                                                                                                                                                                                                                                                        | No           | Not Shared     |

**How do we respond to "do not track" requests and other online technologies?**

We do not respond to "do not track" requests because we do not track you over time or across third party websites to provide targeted advertising. We may track you across our website to help us improve our content.

*Cookies and other online technologies*

We may use "cookies" and similar online technologies to keep, and sometimes track, information about you regarding your usage of our website. Cookies are small data files that are sent to your browser or related software from a Web server and stored on your device. Cookies help us to collect information about your usage of our website, including date and time of visits, pages viewed, amount of time spent on our sites, or general information about the device used to access the site, such as the browser used. You can refuse to store or delete cookies by configuring your web browser settings. Most browsers and mobile devices have their own settings to manage cookies. If you refuse a cookie when on our website, or if you delete cookies, you may experience some inconvenience in your use of our website, such as having to re-configure preferences.

**State-specific Regulations**

|               |                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| California    | In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.                                        |
| Massachusetts | In response to a Massachusetts law, clients must "opt-in" to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. |

|         |                                                                                                                                                                                                                                                  |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Vermont | In response to a Vermont regulation, if we disclose personal information about you to non-affiliated third parties, we will only disclose your name, address, other contract information, and general information about our experience with you. |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

#### "Linked-To" Websites

When you are on this website you may have the opportunity to click-through to other websites, including websites operated by unaffiliated third parties. These sites may collect nonpublic personal Information about you. We do not control sites operated by these entities and are not responsible for the information practices of these sites. This Privacy Policy does not address the information practices of other websites. The privacy policies of websites operated third parties are located on those sites.

#### **Changes to our Privacy Policy**

We will review this Policy annually and we reserve the right to change this Policy from time to time. Any such changes will be effective immediately upon posting to this website. If the changes materially alter the previous Privacy Policy, we may notify you of changes or updates. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

#### **Any Questions?**

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us via email at [levatus@levatuswealth.com](mailto:levatus@levatuswealth.com).