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NOTICE REGARDING CLIENT PRIVACY POLICIES

By using the “Site”(www.JKMilne.com) or providing Personal Information to us you consent to our processing and transfer of your Personal Information as we describe here.

At JKMilne Asset Management, maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information.

Information We Collect (we do not collect this information from everyone): In connection with providing investment management and other services, we obtain non-public personal information about you, including:

- Information we receive from you during telephone calls or other communications, or on account applications or communications with you;
- Information about your transactions with us or others; and
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status for contractual necessity (when applicable);

For visitors to our Site, We Collect:

- Information we receive from you through your use of the Site, such as utilizing our Contact Us forms and signing up to receive newsletters;
- We also utilize technologies to track the use of our Site for analytics.

Categories of Information We Disclose: We may disclose all information that we collect, as described in this Notice or as otherwise permitted or required by law. We do not sell customer lists and will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account or information provided to us, except under the following circumstances:

- To entities that process or provide a financial product or service that you request or authorize, or with whom you maintain an account, such as broker-dealers, custodians, investment companies, or insurance companies;
- To consumer reporting agencies;

- To third parties who perform consulting, marketing, or other services on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

How We Use Information: Information may be used by us and companies that perform support services for us, such as data processors, technical systems consultants and programmers, compliance consultants, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a custodian or broker-dealer providing services to you or your account;
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and regulatory requirements; and
- **To keep you informed** about financial services of interest to you.

Our clients' information may be stored at locations controlled by third parties who provide computer or other services to us or our clients, subject to their agreement not to use the information for purposes unrelated to our business.

Our Security Policy: We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain reasonable and appropriate technical, physical, administrative, and procedural security measures to safeguard confidential information.

Removed/Closed/ Inactive: When we process your Personal Information based on your consent, you have a right to withdraw your consent. You can change your preferences for how or if we contact you us at any time by contacting the Chief Compliance Officer: LGlass@JKMilne.com. You may also use the Contact Us form on our Site to update your contact preferences.

If you decide to close your account(s) or become an inactive customer or potential customer, our Privacy Policy will continue to apply to you.

Changes to This Privacy Policy: If we make any substantial changes in our policies regarding the confidential information about you we disclose or the third parties to which we disclose it, we will notify you. If you have any questions concerning this Privacy Policy, please write to our President at the address shown on this Notice.

For further information or questions, please email LGlass@JKMilne.com or call us 239-936-3430.