



CLIENT PRIVACY NOTICE

Your privacy is very important to us. Balter Capital Management, LLC and Balter Liquid Alternatives, LLC (collectively “Balter”) are committed to protecting the non-public personal information that it receives from time to time with respect to current and prospective individual clients (“Clients”) in connection with the provisions of its investment advisory and/or other services. Non-public personal information, which is generally obtained from applications, forms and other documentation, as well as from specific transactions between the Client and Balter, may include, among other things, the Client’s name, address, social security number or tax identification number, bank account information, financial information, investment objectives, actual investments made and other information with respect to the investment advisory and/or other services provided to or on behalf of the Client by Balter (“Personal Information”). To that end, Balter has adopted this Privacy Policy to:

- (i) ensure the security and confidentiality of Personal Information;
- (ii) protect against anticipated threats or hazards to the security or integrity of Client records and other information; and
- (iii) protect against unauthorized access to or use of Personal Information that could result in substantial harm or inconvenience to Clients. These policies apply to individuals only and maybe changed at any time, provided a notice of such change is given to you.

Balter is permitted to disclose Personal Information about our Clients to our affiliates. Additionally, we may also release certain Personal Information of a Client to non-affiliated third-parties as permitted by law and only if such party has signed a non-disclosure agreement with Balter. Thus, it may be necessary, under anti-money laundering and similar laws, to disclose information about our Clients in order to facilitate our investment advisory services.

Balter seeks to carefully safeguard the Personal Information of our Clients and has therefore adopted these policies regarding the use and handling of Personal Information. We maintain physical, electronic and procedural privacy safeguards to protect your Personal Information.

If you have any questions regarding this Privacy Notice, please contact our Chief Compliance Officer, Rebecca Gompper, at 857-383-3478.

