



## Privacy Policy

Sebold Capital Management requires that you provide current and accurate financial and personal information. Sebold Capital Management maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients' nonpublic personal information. Through this policy and its underlying procedures, Sebold Capital Management attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

### Safeguarding Customer Documents

We collect non-public customer data in checklists, forms, in written notations, and in documentation provided to us by our customers for evaluation, registration, licensing or related consulting services. We also create internal reports of such data. During business hours, it is the policy of Sebold Capital Management to restrict access to all current and former clients' information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services to the client. During hours in which the company is not in operation, the customer records will be locked.

No individual who is not authorized shall obtain or seek to obtain personal and financial customer information. No individual with authorization to access personal and financial customer information shall share that information in any manner without the specific consent of a firm principal. Employees violating Sebold Capital Management procedures regarding customer and consumer privacy will result in discipline and may lead to termination.

Should security be breached, the parties involved and the authorities will be notified if the situation warrants those actions.

**Sebold Capital Management has a Continuity Plan in place should there be a disaster or communication systems breakdown.**

### Sharing Nonpublic Personal and Financial Information

Sebold Capital Management is committed to the protection and privacy of its customers' and consumers' personal and financial information. Sebold Capital Management will not share such information with any affiliated or nonaffiliated third party except:

- When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians;
- When required to maintain or service a customer account;
- To resolve customer disputes or inquiries-with client's permission:
- With persons acting in a fiduciary or representative capacity on behalf of the client – only with client's written permission
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- In connection with a sale or merger of Sebold Capital Management's business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- To comply with federal, state or local laws, rules and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- In any circumstances with the customer's written and/or verbal instruction or consent; .

### Opt-Out Provisions

It is not a policy of Sebold Capital Management to share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service customer accounts or is mandated by law, there are no allowances made for clients to opt-out.

### Offer of Form ADV Part II

Sebold Capital Management is required to annually offer its advisory clients a copy of its Form ADV Part 2A Firm Brochure and Part 2B Brochure Supplement. You were provided with a copy of this document at the beginning of our advisory relationship. Should you want a copy of our most recent Form ADV Part 2A Firm Brochure and Part 2B Brochure Supplement, contact our office at 630-548-9700.