

Customer Privacy Policy Notice

Caprin Asset Management
January 2019

Regulation S-P, Privacy of Consumer Financial Information, requires financial institutions, including Caprin, to provide notice to current clients and prospective clients about their policies and practices concerning the collection and use of customer, non-public information. This privacy policy notice is given to all prospective clients of Caprin upon entering into a contract with Caprin and annually thereafter.

Privacy Disclosure Statement. A primary goal of Caprin is to protect the privacy of its clients. Caprin does not sell the personal information of clients to anyone.

To conduct regular business, Caprin may collect non-public personal information from clients. This information is provided by clients to Caprin on applications and other forms provided by clients to Caprin as well as transactions with the firm, our affiliates, or others.

Caprin may enter into contracts with outside third parties so that Caprin can assist its clients in servicing their accounts. In order to do this, Caprin will disclose personal information to companies that help Caprin process transactions for client accounts (for example, executing client trades through a broker/dealer). However, Caprin does not share or disclose any non-public customer information except as allowed or required by law. In addition to sharing information in order to provide financial services to clients, Caprin may be required to disclose personal information to cooperate with regulators or law enforcement authorities, to resolve customer disputes or for risk control.

Information Safeguarding. Caprin has implemented strict policies and procedures aimed at protecting the sensitive nature of client information. Caprin restricts access to client information to only those members of Caprin that must provide products and services to clients in order to service client accounts. Caprin has implemented physical, electronic, and procedural safeguards aimed at meeting Caprin's duty to protect non-public client information.

If you have any questions concerning Caprin's customer privacy policy or concerns about your personal information please feel free to contact Caprin's Privacy Officer, Ben Bishop, who can be reached at 804-648-3333 ext 331 or via email at bbishop@caprinbonds.com.