

CLIENT PRIVACY POLICY

As an important part of our fiduciary responsibility to our clients' Intelligent Investment Management, LLP maintains a commitment to confidentiality and privacy of client information. We are committed to do so as a matter of trust between our clients and Intelligent Investment Management, LLP.

When we use the words "you" and "your" in this policy, we mean current or former clients who have or have had a client relationship with Intelligent Investment Management, LLP. Nonpublic personal information means information about you that we collect in connection with providing to you our services. Nonpublic personal information does not include information that is available from public sources such as county records and telephone directories.

How We Gather Information

This information is collected from you through written correspondence, by telephone, e-mail and in the course of your personal consultations. We may collect nonpublic personal information from other companies or professionals you may retain, such as other fiduciaries, accountants and other investment advisors.

The information we collect may include your name, address, date of birth, identification photos, driver's license number, telephone and facsimile numbers, email addresses, Social Security number, tax identification number, beneficiary information, banking and tax return information and investment objectives. Once you have an active account, we manage your account by collecting and maintaining personal information about your transactions including balances, positions and account history. This information is used for financial planning and investment management purposes.

Restrictions on Disclosure of Nonpublic Personal Information

We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as permitted by law. Unless a client has specifically authorized us to do so, we do not disclose your personal information to others except in the following limited circumstances:

- We disclose personal information to non-affiliated brokers, accountants, attorneys and other agents; including TD Ameritrade Institutional and other custodians. This helps us provide advisory services, process your transactions and service your accounts. We may also provide your information to vendors providing data processing, computer software maintenance and development, customer relationship management (CRM) systems, financial record and communication archive storage systems, compliance and legal consulting and other general business consulting services. These vendors are required to comply with Federal and State data security requirements.
- We may also disclose personal information if we believe in good faith that such disclosure is required to comply with applicable laws, such as cooperating with regulators or to resolve any consumer disputes.

Our Security Practices

We restrict access to nonpublic personal information of clients and former clients to those employees who need to know that information in the course of their responsibilities with the Firm. We maintain physical, electronic and procedural safeguards to guard your information. We do utilize vendors who provide services in “the cloud” and these vendors do comply with Federal and State data security requirements. However, no system is perfectly secure or reliable. The internet is an inherently insecure medium, and the reliability of hosting services, internet intermediaries, your internet service provider, and other service providers cannot be assured. As a client of Intelligent Investment Management, LLP you accept these risks and the responsibility that technology does not provide perfect security or reliability.

Other Information

We do not sell, share, or disclose non-public information to non-affiliated third-party marketing companies. The examples contained within this Privacy Policy are illustrations and are not intended to be all-inclusive. We also reserve the right to change this Privacy Policy, and any other policies described above, at any time. We provide this Privacy Policy on an annual basis and upon request.

If you have any questions, please contact Intelligent Investment Management, LLP at (970) 403-1234.

March 2019