

**Brackenwood Capital Management, LLC**  
REGISTERED INVESTMENT ADVISOR

---

**PRIVACY POLICY**

**Privacy Policy of Brackenwood Capital Management, LLC**

Brackenwood Capital Management, LLC (“BCM”) has adopted this privacy policy with recognition that protecting the privacy and security of the personal information we obtain about our clients is an important responsibility. We also know that our clients expect us to service them in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about them. We want our clients to know what information we collect and how we use and safeguard this information.

**What Information We Collect**

---

BCM does not disclose the nonpublic personal information we collect about our clients to anyone except in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers, etc.) or as otherwise provided by law.

**What Information We Disclose**

---

BCM is permitted by law to disclose the nonpublic personal information about our clients to other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose. If our clients decide at some point to either terminate our services or become an inactive client, we will continue to adhere to our privacy policy, as may be amended over time.

**Security of Our Clients’ Information**

---

BCM restricts access to our clients’ nonpublic personal information to those employees who need to know that information to service their account. We maintain physical, electronic and procedural safeguards that comply with applicable federal and state standards to protect their nonpublic personal information.

**Changes to our Privacy Policy or Relationship with Our Clients**

---

Our policy about maintaining and disclosing information may change over time. We will provide our clients with notice of any material change to this policy before we implement any amendment to it.

---

Client Signature/Date

---

Mark Kruse