



## **Privacy Policy**

**Effective as of: January 1<sup>st</sup>, 2020**

**Revised: December 31, 2023**

## **Jirau Capital Management LLC Privacy Policy**

### **Our Commitment to You**

Jirau Capital Management LLC (“JCM”) is committed to safeguarding the use of your personal information that we have as your investment advisor. JCM (referred to as “we”, “our” and “us” throughout this notice) protect the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your nonpublic personal information to anyone. Nor does JCM provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal nonpublic information is collected and used are set forth in this privacy policy.

### **The Information We Collect About You**

You typically provide personal information when you complete the paperwork required to become our client. This information may include your:

- Name and address
- Assets
- E-mail address
- Income
- Phone number
- Account balance
- Social security or taxpayer identification number
- Investment activity
- Accounts at other institutions

In addition, we may collect nonpublic information about you from the following sources:

- Information we receive on Brokerage Agreements, Investment Management Agreements and other Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires; and/or
- Information about your transactions with us or others (as applicable).

### **Information about You That JCM Shares**

JCM works to provide products and services that benefit our customers. We may share nonpublic personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose nonpublic personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your nonpublic personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy JCM’s regulatory obligations, and is otherwise

required or permitted by law. Lastly, we may disclose your nonpublic personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

We do not sell your nonpublic personal information to anyone.

### **Information about Former Investors**

JCM does not disclose, and does not intend to disclose, nonpublic personal information to non-affiliated third parties with respect to persons who are no longer our clients.

### **Confidentiality and Security**

Our employees are advised about the firm's need to respect the confidentiality of our customers' nonpublic personal information. Additionally, we maintain physical, procedural, and electronic safeguards in an effort to protect the information from access by unauthorized parties.

### **We'll keep you Informed**

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of nonpublic personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at [info@jiraucapital.com](mailto:info@jiraucapital.com).