



## PRIVACY POLICY

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. However to be successful in this environment, we must continue to insure that our clients are confident that we will manage their financial affairs expertly and confidentially. In delivering our investment management services as effectively and conveniently as possible, it is essential that we at Radius Capital Management use technology to manage and maintain certain client information. We want to assure all of our clients that whenever information is used, it is done with discretion.

Please note that throughout this document the term “client” is used to refer to all past, current, and potential future clients of Radius Capital Management.

Safeguarding client information is an issue we take seriously at Radius Capital Management. To affirm our continuing commitment to the proper use of client information, we have set forth the following Privacy Principles, which guide us in serving the privacy needs of our clients.

- 1. Recognition of a Client’s Expectation of Privacy:** At Radius Capital Management, we believe the confidentiality and protection of client information is one of our fundamental responsibilities. Moreover, while information is critical to providing quality service, we recognize that one of our most important assets is our clients’ trust. Thus, the safekeeping of client information is a priority for Radius Capital Management.
- 2. Use, Collection, and Retention of Client Information:** Radius Capital Management limits the use, collection, and retention of client information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our clients. Information collected may include, but is not limited to name, address, telephone number, tax identification number, date of birth, employment status, annual income, and net worth.
- 3. Maintenance of Accurate Information:** Radius Capital Management recognizes that it must maintain accurate client records. Therefore, Radius Capital Management has established procedures to maintain the accuracy of client information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.
- 4. Limiting Employee Access to Information:** At Radius Capital Management, employee access to personally identifiable client information is limited to employees who need such information when servicing your account. Employees are educated on the importance of maintaining the confidentiality of client information and on these Privacy Principles. Because of the importance of these issues, all Radius Capital Management employees are responsible for maintaining the confidentiality of client information, and employees who violate these Privacy Principles will be subject to disciplinary measures.



5. **Protection of Information via Established Security Procedures:** Radius Capital Management recognizes that a fundamental element of maintaining effective client privacy procedures is to provide reasonable protection against the unauthorized access to client information. Therefore, Radius Capital Management has established appropriate security standards and procedures to guard against any unauthorized access to client information.
6. **Restrictions on the Disclosure of Client Information:** When it comes to sharing client information with unaffiliated companies, Radius Capital Management places strict limits on who receives specific information about client accounts and other personally identifiable data.

Radius Capital Management does not disclose any nonpublic personal information about its clients or former clients to any nonaffiliated third parties except as required by or as permitted by law. In the course of servicing client accounts, we may share some information with service providers who assist us in providing our products and services to our clients in the normal course of our business, such as transfer agents, custodians, broker/dealers, accountants, attorneys, and/or consumer reporting agencies and governmental agencies, when legally required or permitted in connection with fraud investigations and litigation, in connection with acquisitions and sales, and at the request or with the express permission of a client.

7. **Maintaining Client Privacy in Business Relationships with Third Parties:** If we provide personally identifiable client information to a third party with which we have a business relationship, we will share the minimum amount of information necessary for that company to provide its product or service. Moreover, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.
8. **Disclosure of Privacy Principles to Clients:** Radius Capital Management recognizes and respects the privacy expectations of our clients. We want our clients to understand our commitment to privacy in our use of client information. Because of our commitment, we have developed these Privacy Principles, which we make readily available to our clients. Clients who have questions about these Privacy Principles or have a question about the privacy of their client information should call Kimball Halsey at (617) 661-4200 or e-mail him at [khalsey@radius-capital.com](mailto:khalsey@radius-capital.com).

These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our clients. Radius Capital Management reserves the right to make changes to this policy. In such an event, we will notify you in writing before we make changes that affect the way we collect or share your information. A copy of Radius Capital Management's privacy policy notice will be provided to clients prior to, or contemporaneously with, the execution of the advisory agreement. Thereafter, Radius Capital Management will deliver a copy of the current privacy policy notice to its clients annually.