



## PRIVACY POLICY

### **Our commitment to you:**

As our client, you have entrusted to our care not only your money but your personal and financial data as well. We recognize that your relationship with us is based on trust, and that you expect us to act responsibly and in your best interests. Because your personal and financial data are your private information, we hold ourselves to the highest standards in their safekeeping and use.

*This means, most importantly, that we do not sell or reveal confidential client or former client information – whether it is your personal information or the fact that you are a CMIQ client – to anyone, unless required by law.* Instead, we use your information primarily for compliance purposes, to complete transactions or to make you aware of services that we offer.

### **The information we collect about you:**

You provide personal information when you complete a CMIQ client package. In addition to personal information you provide us, we may receive information about you that you authorize third parties to provide to us. We also may obtain personal information from third parties in order to verify your identity, to prevent fraud, or to help us identify services that may benefit you. Personal information collected from any source may include, among other things, your name and address, Social Security or taxpayer identification number, date of birth, assets, income, account balances, investment activity, and accounts at financial institutions.

### **How we handle your personal information:**

We do not sell personal information about current or former clients or their investments to third parties. Nor do we share such information, except with service providers, which have confidentiality obligations to us.

- In order to complete certain transactions or changes that you direct, it may be necessary to provide identifying information to our service providers or companies, individuals or groups that are not affiliated with CMIQ. For example, if you ask to transfer assets from another financial institution to CMIQ, we will need to provide certain information about you to that company to complete the transaction.
- In order to alert you to other services that CMIQ offers, we may share your information within the CMIQ family of affiliated companies. This would include, for example, sharing your information within CMIQ to make you aware of new CMIQ offerings.
- In certain instances, we may contract with nonaffiliated companies to perform services for us, such as prime brokerage and custodial services. Where necessary, we will disclose information we have about you to these third parties. In all such cases, we provide the third party with only the information necessary to carry out its assigned responsibilities, and only for that purpose. And we require these third parties to treat your private information with the same high degree of confidentiality that we do.
- Finally, we will release information about you if you direct us to do so, if we are compelled by law to do so, or in other legally limited circumstances (for example, to prevent fraud).

### **How we protect privacy online:**

Our concern for the privacy of our clients naturally extends to those who use our website, [www.capitalmarketsiq.com](http://www.capitalmarketsiq.com)

- We do not use cookies to pull data from your hard drive, to learn your e-mail address, or to view data in cookies or other similar data files created by other websites. We will not share the information in these data files or give others access to it – except to help us better serve you.
- When you visit our website, we may collect certain technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our website. This information may be used, for example, to alert you to software compatibility issues or to resolve technical or service problems, or it may be analyzed to improve our web design and functionality and our ability to serve you.

### **How we safeguard your personal information:**

Within CMIQ, we restrict access to personal information about you to those CMIQ employees who need to know the information in order to perform their jobs. To protect your personal information, we maintain physical, electronic and procedural safeguards in keeping with customary standards and practices, and we review and adjust these safeguards regularly in response to advances in technology.

### **We will keep you informed:**

We will disclose our privacy policy on our website. We reserve the right to modify this policy at any time, but rest assured that if we do change it, we will tell you promptly.

Please contact us via e-mail with any additional concerns / questions at: [legal \(at\) capitalmarketsiq \(dot\) com](mailto:legal(at)capitalmarketsiq(dot)com)