



PRIVACY NOTICE

I. Introduction

Pursuant to Securities and Exchange Commission (“SEC”) Regulation S-P, investment advisers must adopt and implement policies and procedures designed to: 1) ensure the security and confidentiality of client records and information; 2) protect against any anticipated threats or hazards to the security or integrity of client records and information; and, 3) protect against unauthorized access to or use of client records or information that could result in substantial harm or inconvenience to any client. Furthermore, investment advisers must provide their clients with an initial privacy notice at the time a client relationship is established and an annual privacy notice thereafter. As pooled investment vehicle(s) are not natural persons, investment advisers are not required to provide privacy notices to each pooled investment vehicle client; however, Federal Trade Commission (“FTC”) rules require that all investment advisers provide their clients and any investors, who are natural persons, with initial and annual privacy notices.

II. Policy

Moerus Capital Management, LLC (“**Moerus**” or the “**Firm**”) does not disclose any nonpublic personal information about its clients to nonaffiliated third parties except to service or manage the client’s account or as permitted by law. Furthermore, Moerus restricts access to the personal information of its clients to those employees who need that information to provide products or services to the client. If a client closes their account, Moerus will continue to adhere to its privacy policy with respect to the nonpublic personal information of that client. The disposal of nonpublic personal information shall be done in a secure manner as described in Moerus’ Compliance Manual. Moerus must also comply with the California Financial Information Privacy Act (SB1) if business is conducted with California clients. For clients who are Massachusetts residents, Moerus will follow the Massachusetts Standards for Protection of Personal Information (210 CMR).

III. Collection

Moerus collects nonpublic personal information about its clients to serve their investment needs, provide customer service, offer new products and services and comply with legal and regulatory requirements. In particular, Moerus collects information to help determine which products and services clients are eligible for and which products and services are best suited for its clients. The type of nonpublic personal information Moerus collects from clients may include the following:

- ✧ name,
- ✧ address,
- ✧ telephone number,
- ✧ information regarding existing securities accounts,
- ✧ educational and employment history,



- ✧ prior investment experience with different types of investment vehicles, and any relationships a client may have with others involved in the securities business,
- ✧ social security number, and
- ✧ financial status (assets and income).

Moerus collects this information about its clients from the following sources:

- ✧ documents such as an application,
- ✧ transactions with Moerus and its affiliates in which the client participates, and
- ✧ correspondence and other communications (including telephone, mail and e-mail) with clients.

IV. Opt Out Right

Every client has the right to direct Moerus to not disclose the nonpublic personal information about that client to a nonaffiliated third party. If a client would like to exercise its right to opt out of Moerus' privacy policy, each client must provide a written statement exercising that right. This right to opt out may be exercised at any time and will remain in effect until written notice revoking said right is received by Moerus from the client. However, in the event Moerus encounters circumstances where it is compelled by law to disclose the client's nonpublic personal information, Moerus must provide the client's information even if the client has exercised its right to opt out.

V. Confidentiality and Security

Except as described below, access to nonpublic information about clients, former clients and prospective clients is restricted to Moerus employees who need to know that information in order to provide products or services to clients. Those employees with access to nonpublic personal information are required to protect the confidentiality of that information. Moerus maintains physical and procedural safeguards to protect nonpublic personal information.

VI. Physical Safeguard Procedures

1. When in use, client information should not be left unattended under any circumstances.
2. Moerus' offices are located in a secured building and are locked at all times to prevent unauthorized entry onto the premises.
3. Physical access to Moerus' offices is limited to authorized personnel only and any visitors should remain escorted at all times.
4. Any hard copy documents containing client information that are not to be retained are to be shredded promptly.



VII. Electronic Safeguard Procedures

1. All PCs and mobile devices with access to client information should be password protected and have active and current anti-virus, anti-spyware, firewall protection, and remote wipe capabilities.
2. When not in use, all PCs and mobile devices should be locked in screen saver mode.

VIII. Uses of Information

Client information may be used internally to provide advisory services to clients, to open an advisory account and one or more securities brokerage accounts, to process transactions for client accounts, for account maintenance and otherwise to provide investment advisory services.

Moerus may also provide nonpublic personal information (including each type of nonpublic information that we collect listed above) about its clients and former clients to:

- ✧ unaffiliated financial service providers, such as a broker-dealers, custodians or other firms that have a need for such information in order to service or process a financial product or service requested or authorized by you or who will maintain or service client accounts on Moerus' behalf,
- ✧ broker-dealers and other financial institutions in connection with determinations of eligibility to participate in initial public offerings,
- ✧ broker-dealers, issuers and their counsel in connection with determinations of eligibility and participation in private securities placements,
- ✧ attorneys, accountants and auditors retained by Moerus, to the extent required by them to perform services for Moerus and its clients,
- ✧ as permitted or required by federal state or local law, such as in response to a subpoena, to prevent fraud or to comply with an inquiry or other requirement of a governmental agency or regulator, and
- ✧ to an affiliate whose privacy and confidentiality policy is at least co-extensive with that of Moerus.

Many jurisdictions are in the process of changing or creating anti-money laundering, embargo and trade sanction, or similar laws, regulations, requirements or regulatory policies (whether or not with force of law) and many financial intermediaries are in the process of changing or creating responsive disclosure and compliance policies (collectively "**AML Policies**," which are further described in Moerus' Compliance Manual). Moerus may provide nonpublic personal information that has been collected from clients, former clients, and prospective clients in respect of AML Policies or information requests related thereto to relevant third parties.



MOERUS
CAPITAL MANAGEMENT

Moerus does not otherwise provide nonpublic personal information about clients, former clients or prospective clients to anyone without the consent of the client.

This policy applies to Moerus, its owners and to each client account sponsored by Moerus.

If you have any questions, please call Moerus Capital Management LLC at 212-461-4088.