



Privacy of Consumer Information Policy

Our Commitment to Your Privacy: Victrix Investment Advisors LLC has a policy of protecting the confidentiality and security of information we collect about our clients. We do not share nonpublic information about you ("Information") outside of the Firm without your consent except for the specific purposes described below, in accordance with all applicable laws. This Notice describes the Information we may gather and the circumstances under which we may share it.

Why We Collect and How We Use Information: We limit the collection and use of Information to the minimum we require to deliver superior service to you. Such service includes maintaining your portfolio accounting, processing discretionary transactions and those requested by you or other persons authorized by you, and administering our business.

How We Gather Information: We get most Information directly from you or your representative. This Information may relate to your finances, employment, avocations or other personal characteristics, as well as transactions and interactions with or through us or with others.

How We Protect Information: Our employees and investment adviser representatives acting on our behalf are required to protect the confidentiality of Information and to comply with our established policies. They may access Information only when there is an appropriate reason to do so. We also maintain physical, electronic, and procedural safeguards to protect Information, which comply with all applicable laws. Employees are required to sign a Confidentiality Agreement. Employees who violate our Privacy Policy will be subject to disciplinary process.

Disclosure of Information: We may disclose any Information when we believe it necessary for the conduct of our business, or where disclosure is required by law. For example, Information may be disclosed for audit or research purposes, to attorneys or other professionals, or to law enforcement and regulatory agencies to help, among other things, prevent fraud or money laundering. In addition, we may disclose Information to third party service providers to enable them to provide business services for us, such as performing computer related or data maintenance or processing services for us, to facilitate the processing of transactions, or for credit review or reporting purposes. **We will not make any disclosures** of information to other companies who may want to sell their products or services to you. For example, **we do not sell customer lists** and **we will not sell your name** to a catalogue company or telemarketer.

Our Former Clients: Even if you are no longer a Victrix Investment Advisors LLC client, our Privacy Policy will continue to apply to you.

To Whom This Policy Applies: This Privacy Policy applies to services provided by Victrix Investment Advisors LLC offices and its employees.



Access to and Correction of Information: Upon your written request, we will make available for your review any file we may maintain for your personal Information; provided, however, that any Information collected in connection with, or in anticipation of, any claim or legal proceeding will not be made available. If you notify us that any Information is incorrect, we will review it. If we agree, we will correct our records. If we do not agree, you may submit a short statement of dispute, which we will include in any future disclosure of the disputed Information.

Further Information: We reserve the right to change this Privacy Policy at any time. The examples contained within this Privacy Policy are illustrations and are not intended to be exclusive. This notice complies with a recent Federal law and regulations regarding privacy. You may have additional rights under other foreign or domestic laws that may apply to you.