



COLBERT INVESTMENT MANAGEMENT CO

Privacy Notice

Current as of March 2024

Colbert Investment Management Co. (“CIM” the “Firm” “we” or “us”) recognizes and respects the privacy concerns of its clients. We provide this notice to you so that you will be aware of the kinds of information we collect and the circumstances under which that information may be disclosed to third parties. We do not disclose any nonpublic personal information about our clients or former clients to anyone, except as permitted by law.

CIM collects nonpublic personal information about you (such as your name, address, account balance, redemption or withdrawal history, assets, and income) from the following sources:

- Information received from you on account applications, agreements, questionnaires, or other forms;
- Information about your transactions with us or others;
- Information received from you in written, telephonic, or electronic communications with us or others; and
- Information received from a consumer reporting agency.

In order to service your account and effect your transactions, we may provide your personal information to financial service providers that assist us in servicing your account and have a need for such information, such as a broker or administrator.

We require third party service providers and financial institutions to protect the confidentiality of your information and to use the information only for the purposes for which we disclose the information to them. We do not otherwise provide information about you to outside firms, organizations, or individuals except to our attorneys, accountants, consultants, and auditors and as permitted by law.

CIM restricts access to nonpublic personal information about you to our employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your personal information.

In the event that you invest with us through a financial intermediary, including, but not limited to, a broker-dealer, bank or trust company, the privacy policy of your financial intermediary will govern how your non-public personal information will be shared with non-affiliated third parties by that entity.

CIM will share information, as necessary and required by law: to cooperate with regulatory or government authorities; to comply with a court order or subpoena; or when such disclosures will help support our detection of, prevention of, or response to fraud; help protect your safety or security; or protect the safety and security our services.

Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to customers or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect potential red flags to prevent and mitigate identity theft.

We have put in place commercially reasonable steps and safeguards to maintain data security with respect to your personal information and protect the personal data we hold from misuse and loss and from unauthorized access, modification, or disclosure. Despite these measures, however, we cannot guarantee that your data will be secure.

From time to time, we may update our Privacy Policy. If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Notice, please contact us at (305) 400-9982.