PELORUS
CAPITAL MANAGEMENT

PRIVACY POLICY NOTICE

Pelorus Capital Management, LLC ("PCM" or "We") have adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information.

What we do with your Personal Information

WHAT INFORMATION WE COLLECT	We collect certain nonpublic personal identifying information about you. This information can include: address, social security number, income, and information that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).
WHAT INFORMATION WE USE AND SHARE	All financial companies need to share customers' personal information to run their everyday business. We do not disclose the nonpublic personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, third-party managers etc.); (ii) to the regulators or persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (iii) to firms that assist in servicing your account and have a need for such information, such as a broker, custodian, attorney, accountant, or auditor; or (iv) as otherwise provided by law. We are permitted by law to disclose nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf). Third parties are prohibited from using or sharing

	the information for any other purpose. If you decide at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time. Our policy is never to share, sell or distribute your phone number to any third party without your explicit consent, unless required by law.
HOW WE PROTECT YOUR INFORMATION	We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.
CHANGES TO OUR PRIVACY POLICY	Our policy about obtaining and disclosing information may change from time to time. We will provide you with notice of any material change to this policy before we implement the change.
QUESTIONS	If you have any questions concerning this privacy policy, please contact us at (714) 902-2727.