

# FTS FUND SERVICES LLC

## Privacy Policy

### Your Privacy is Important to Us

We value your trust and confidence in us and want to assure you your personal information is kept completely confidential by us. We adhere to the highest level of professional ethical responsibility and obligations to protect the confidentiality of your information. We adhere to confidentiality standards for our business clients under strict ethical responsibilities mandated by both the American Institute of Certified Public Accountants and various state societies of Certified Public Accountants.

This Privacy Policy summarizes what information we collect about you, the limited times when we may share it with others, and how we protect your privacy.

### TYPES OF PERSONAL INFORMATION WE COLLECT

To meet your needs, we collect various types of personal information about you from the following sources:

- Information that we receive from you when we meet with you in person or over the telephone, when you send us information by mail or email, on worksheets or other documents used in providing services to you. Such information may include, for instance, individual/investor names, addresses, taxpayer identification numbers, investment holdings and amounts, and other tax and financial attributes.
- Information we receive from you, or send to you, at your request if you contact us online. We will retain the information you provide us to deliver email messages to you. We may retain the content of your email messages, your email address, and our subsequent responses to you.

### PARTIES TO WHOM WE DISCLOSE INFORMATION

We may share personal information with your investment advisors, legal counsel or others as directed by you to assist in our contact with you and to aid in providing services to you. We do not share personal information with unaffiliated third parties without your express consent, except as permitted by law and as described below.

The law permits disclosure in certain circumstances, such as if we must share information to protect against fraud, in response to a court subpoena, and sharing with others who may be assisting us in compliance with professional standards or who assist us in providing services to you.

We may also share any, or all, of the information we collect, as described above with nonaffiliated third parties that perform other software support and services on our behalf, such as outside data processing, tax preparation and mailings.

For your protection, our agreements with these entities require that they also keep your personal information in the strictest of confidence, just as we do.

## **PROTECTING THE CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION**

Keeping your information confidential and secure is of utmost importance to us. We maintain physical, electronic, and procedural safeguards to guard your personal information. In doing so, we restrict access to your personal information to those employees who need to know that information to provide services to you and to the aforementioned support service companies. Those companies are, in turn, legally and contractually bound to maintain the privacy of any information shared with them. Our employees are bound by internal confidentiality policies and are subject to disciplinary action for any policy violations. Should your status become inactive or should our relationship end, we will continue to protect the confidentiality and security of your personal information in accordance with this privacy policy.

That means we cannot disclose your identity, income, net worth, tax liabilities, or other protected information to the Internal Revenue Service, state tax authorities, unmarried partners, friends, relatives, real estate agents, fiduciaries, mortgage brokers, banks, or any other person or company without your explicit authorization.

The sharing of any of your tax return information to any third parties can only be authorized by you providing permission and we have a clearly established procedure in place for authorized sharing. We will provide you with the proper documents each year for your authorization for those specific requests made by you.

### **OUR PLEDGE TO YOU**

Our professional ethical obligations and responsibilities demand the highest regard and duty toward the confidentiality of your personal information and security of your privacy. We will protect your personal information, use it appropriately, and accomplish our engagements with you in such manner as to always maintain your trust and confidence. This is a declaration of our commitment to your privacy. Under a separate documentation we have the specific processes and technologies in place to meet said privacy and confidentiality. Please call Mike Schiavo at (978) 505-7510 or Will McEnroe at (212) 935-0004 if you have any questions.