

## PRIVACY POLICY OF SCG ASSET MANAGEMENT LLC

This privacy policy explains the manner in which SCG Asset Management LLC collects, utilizes and maintains nonpublic personal information about our advisory clients, as required under applicable federal law.

Collection of Client Information. We collect personal information about our clients mainly through the following sources: investment management agreements, application forms, due diligence and other questionnaires and other information provided by the client in writing, in person, by telephone, electronically or by any other means. This information includes name, address, nationality, tax identification number, and financial and investment qualifications and objectives; and transactions in your managed accounts, including account balances, trading activity, investments and withdrawals.

Disclosure of Nonpublic Personal Information. We do not sell or rent client information. We do not disclose nonpublic personal information about our clients or former clients, except as permitted by law. For example, we may share nonpublic personal information to service providers (e.g., attorneys, accountants, administrators and other professionals) in connection with the administration and servicing of your investment account. In addition, we may disclose information to service providers, including administrators and counterparties with whom we do business, in order to satisfy any anti-money laundering related customer identification procedures required by any laws or regulations applicable to such entities.

Protection of Client Information. We maintain physical, electronic and procedural safeguards that comply with federal standards to protect your nonpublic personal information. Our policy is to require that all employees, financial professionals and companies providing services on our behalf keep our client information confidential. In particular, we restrict access to the personal and account information of clients to those employees who need to know that information in the course of their job responsibilities. Also, third parties with whom we share client information must agree to follow appropriate standards of security and confidentiality.

Changes to Privacy Policy. We will not change our privacy policy in the future in a way that affects you without first sending you a revised privacy policy describing the change.

January 2022