

# Customer Privacy Policy Notice

Effective 7/29/2024

## Commitment to Your Private Information

Fidelis Capital Partners ("Fidelis Capital," "we," "us" or "the Firm") has developed a policy of protecting the confidentiality and security of the information we collect about our clients. We do not and will not share non-public personal information about you ("Information") with unaffiliated third parties without your consent, except for the specific purposes described below. This notice has been provided to you to describe the Information we may gather and the situations under which we may need to share it.

## Why We Collect and How We Use Information

We limit the collection and use of Information within our firm and our affiliated companies to only those individuals associated or employed with us that must have information to provide financial services to you. Such services include maintaining your accounts, processing transaction requests, providing financial planning, financial advisory, and other services as described in our Firm Brochure.

## How We Gather Information

We get most Information directly from you when you provide us with information from any of the following sources:

- Applications or forms (e.g., name, address, Social Security number, birthdate, assets, income and financial history)
- Transactional activity in your account (e.g., trading history and account balances)
- Information services and consumer reporting sources (e.g., to verify your identity or to assess your credit history)
- Other sources with your consent (e.g., your insurance professional, attorney or accountant)

## How We Protect Information

Our employees and affiliated persons are required to protect the confidentiality of Information and to comply with the guidelines in our stated policies. We restrict access to authorized associates who have a need for those records only. Employees who violate our Privacy Policy are subject to disciplinary action, up to and including termination from employment with us. We also maintain physical, electronic and procedural safeguards to protect information, which comply with applicable SEC, federal and state laws.

## What Information Do We Collect from You?

- Information about your identity including name, address and Social Security number.
- Information about your transactions.
- Information about your personal financial profile, such as your risk tolerance levels, goals and objectives, assets, liabilities, savings and investments.

## What Information Do We Collect from Other Sources?

- Information we receive from you on contracts and other forms, such as risk tolerance questionnaires and investment policy statements.
- Information about your transactions with our affiliates and others.
- If you visit our website, information we collect via a web server (often referred to as a "cookie"). Cookies indicate where a site visitor has been online and what has been viewed. Please see our website for more detailed information and to manage your cookie preferences.

## How Do We Protect Your Information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

## How Do We Share Your Information?

The firm shares Client personal information to effectively implement its services. We only share your non-personal information with your representatives within our firm, affiliates and non-affiliated companies or individuals as permitted by law, such as mutual funds, insurance companies and other product vendors, or to comply with legal or regulatory requirements. With your approval, we may also share information about you with your advisors, which can include your accountant and/or attorney. Additionally, in the normal course of business, we may disclosure information we collect about you to companies or individuals that contract with us to perform servicing functions such as:

- record keeping services,
- computer related services, and
- good faith disclosures to regulators who have regulatory authority over the company.

Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. Notwithstanding the above, we will not release the information about our customers or former customers unless we receive prior written consent, and we believe the recipient to be you or your authorized representative, or are required to do so by law.

We do not sell your personal information to anyone.

## Changes to Our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal

information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Former Customers

Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you, and we will continue to treat your non-public information with strict confidentiality.

### Opt-Out Provisions

We have taken steps to ensure that all third-party vendors have confidentiality clauses to protect your personal information. Should we not have such written agreements in place, then you have the option to “opt out” of sharing this information. Please provide written instruction to our Chief Compliance Officer at the email address listed below. Additionally, the law allows you to “opt out” of only certain kinds of information sharing with third parties. We do not share personal information that triggers this opt-out, therefore you are already opted out of these sharing situations.

### Special Notice for California Residents

We will not share information we collect about you with non-affiliated third parties, except as permitted by California law, such as to process your transactions or to maintain your account. If you are a California resident, you have additional privacy options, which are discussed in the “Important Privacy Choices for Consumers (CA Residents)” form, which will be provided to you.

### Any Questions?

You may obtain a copy of our current Privacy Policy or ask questions by emailing Christy Fabian, Chief Compliance Officer, at [compliancemailbox@fideliscapital.com](mailto:compliancemailbox@fideliscapital.com) or by calling 813-934-6233.