



## **Privacy Policy**

We at Alhambra Investment Management, LLC ("AIM") understand and appreciate that our clients are concerned about their privacy and about the confidentiality and security of information that we may obtain from them. Protecting our clients' privacy is of paramount importance to AIM. This policy describes the steps we have taken to safeguard your information and what client information we may share with others.

If you choose to become a client of AIM, you will need to give us certain personal information so we may open and manage your account. We pledge our commitment to maintain the confidentiality of this information. This Privacy Policy applies to our current and former clients.

**INFORMATION WE COLLECT:** AIM may collect non-public personal information about you from the following sources:

- Client agreements, application forms and other information that clients provide to us, whether in writing, in person, by telephone, electronically or by any other means. This information may include a client's name, marital status, address, phone number, email address, social security number, employment information, income, assets, investment experience, and credit references;
- Information about your investments and transactions with us, our affiliates and other financial institutions. This may include specific investments, investment history, account balances, and cash deposits and withdrawals;
- Personal tax returns provided by the client

AIM does not sell client information. AIM does not provide client information to persons or organizations who are doing business on their own behalf, for marketing purposes or otherwise.

AIM only discloses non-public client information to nonaffiliated third parties without prior client consent when it is necessary for the conduct of our business or as required or permitted by law, such as:

- If you request or authorize the disclosure of the information;
- To provide client account services or account maintenance;
- To agents, brokers and representatives who service you,
- To companies as necessary to effect, administer, or process a transaction, or
- For maintaining or servicing your account (such as a custodian)
- To respond to a subpoena or court order, judicial process, law enforcement or regulatory authorities, or as otherwise required by federal or state law;
- To help us prevent fraud.

Otherwise, AIM does not disclose any non-public personal information about our clients or former clients to anyone, unless authorized by the client. AIM does not disclose client nonpublic personal information to other companies who may want to sell their products or services to you. For example, AIM does not sell client lists and will not sell client names to catalogue companies.

AIM restricts access to non-public personal information about you to those employees at AIM who need to know that information to provide the products or services to you. AIM maintains physical, administrative and technical procedural safeguards that comply with federal standards to guard your non-public personal information.

AIM requires anyone to whom we disclose your personal information to protect its confidentiality and to use it solely for the purpose for which it is disclosed. AIM enters into contractual agreements with non-affiliated third parties that prohibit the third parties from disclosing or using non-public information other than to carry out the purposes for which we disclosed the information.

AIM recognizes that some clients appreciate receiving information from other companies about products or services that may interest them. Some clients do not want to receive such information. If, at any time in the future, it is necessary to disclose any client personal information in a way that is inconsistent with this policy, we will give our clients advance notice of the proposed disclosure so that they will have the opportunity to opt out of such disclosure. To request that your information not be shared, you may contact Marcelo Perez, Chief Compliance Officer, at (305) 233-3772 and request that we not disclose non-public information about you to any other non-affiliated third parties.

Additionally, AIM has internal controls to keep client information as accurate and complete as possible. If you believe that any information about you is not accurate, please let us know.

From time to time, AIM may amend this privacy policy. You will receive an appropriate notice when our privacy policy changes.

If you have any questions regarding our privacy policy, please contact us by:

- Phone at 305-233-3772; or
- E-mail at [info@alhambrapartners.com](mailto:info@alhambrapartners.com)