

# Privacy Policy

**EFG Asset Management (Americas) Corp.**  
701 Brickell Avenue  
Suite 1350  
Miami, FL 33131  
(305) 482-8000

The privacy of clients is important to EFG Asset Management (Americas) Corp. (hereinafter "EFG Asset Management" or the "Adviser") and the Adviser understands the importance its clients place on the privacy and security of information that personally identifies Clients or their accounts. That is why the Adviser is committed to maintaining the confidentiality, integrity and security of its clients' personal information. The Adviser's relationship with its clients is its most valuable asset, and in a continued effort to maintain its clients' trust and confidence, EFG Asset Management would like Clients to be aware of its policy to protect the confidentiality and security of their personal information. This policy covers personally identifiable information about the Adviser's current and former clients. Personal information is protected by the Adviser in a number of ways.

#### PROTECTING INFORMATION

- Keeping financial information secure is one of the Adviser's most important responsibilities. Adviser will safeguard, according to strict standards of security and confidentiality, any information its customers share with the Adviser.
- Adviser will always maintain control over the confidentiality of its customers' information. All of Adviser's employees are subject to a strict policy requiring confidential treatment of customer information, are trained in the proper handling of customer information, and are subject to disciplinary action if they fail to follow this policy.
- Adviser maintains physical, electronic and procedural safeguards to protect its customers' personal information. Adviser continually assesses new technology for protecting information and upgrading its systems when appropriate.

#### COLLECTING INFORMATION

- Adviser limits the collection and use of personal information to what is necessary to administer Adviser's business and to deliver superior service to the customer. This may include advising the customer about Adviser's products, services, and other opportunities that Adviser believes may interest the customer. Customer information collected by Adviser is limited to information the customer provides us on applications or other forms; information about customer transactions and account experience with Adviser, its affiliates or others; information from a consumer reporting agency, such as information about customer's creditworthiness or credit history; and information from other outside sources regarding their employment, credit or other relationship with the customer or verifying representations made by the customer.

#### SHARING INFORMATION

- Unlike many other financial institutions, Adviser does not sell, share or disclose, nor intend to sell share or disclose any of its customers personal information to anyone outside of the EFG Bank Group (this includes marketers and non-affiliated third parties). Clients do not need to take any action to prevent disclosure, because its personal information will never be disclosed to any external organization unless Adviser has first notified the Client.
- Adviser may disclose and share all of the information that it collects as described above with EFG International and among its subsidiaries and affiliates which constitute the EFG Bank Group and includes Adviser's parent company, EFG Bank & Trust (Bahamas) Ltd., and EFG Bank AG – Cayman Branch, as well as affiliates and subsidiaries of the foregoing. Further, Adviser may disclose and share all of the information that it collects as described above with our attorneys, accountants and other advisors on a need-to-know basis.
- Adviser may disclose or report personal information to nonaffiliated third parties as permitted by law, or to perform necessary credit checks or collect or report debts owed to Adviser, or to protect Adviser's rights or property.
- Where applicable, Adviser may also disclose or report personal information to Pershing LLC or any of EFG Brokerage's counterparties or clearing firms, as required and permitted by law. Pershing, and any clearing firm utilized by EFG Brokerage, are generally registered broker dealers and subject to the same type of restrictions as we are on disclosing personal information.
- On occasion, Adviser hires individuals and companies to provide support services or act on Adviser's behalf. These companies may include payment processing companies, data processing companies, courier and mailing services, record storage companies, and consultants. These individuals and companies might assist Adviser in fulfilling the customers' service requests, processing the transactions, or mailing account statements. All of these companies act on Adviser's behalf, and are contractually obligated to keep the information that Adviser provides to them strictly confidential, and use the information only to provide the services Adviser has asked them to perform.

#### MAKING SURE INFORMATION IS ACCURATE

- Keeping the customers' account information accurate and up to date is very important. If the customers ever find that their account information is incomplete, inaccurate or not current, they should notify Adviser by sending an email to [miamicompliance@efgam.com](mailto:miamicompliance@efgam.com). Adviser will promptly update or correct any erroneous information.

#### KEEPING OUR PRIVACY POLICY UP TO DATE

- Adviser will continuously assess itself to ensure that customer privacy is respected. Additionally, Adviser will provide notice of its privacy policy to its customers in an annual basis. The customer can always review Adviser's current policy by contacting Adviser for a copy.

#### TAPE RECORDING

- Adviser may record phone calls. Adviser maintains an internal "Do Not Call" list and you may elect to be placed on this list at any time by calling EFG at 305.482.8000 and asking for the Compliance Department or e-mailing Adviser at [miamicompliance@efgam.com](mailto:miamicompliance@efgam.com). You may contact the Adviser's compliance department to obtain further information regarding Adviser's privacy policies and telephone solicitation policies. (Please see contact information below).

Adviser's Compliance Department: EFG Asset Management (Americas) Corp., Attention: Compliance Department, 701 Brickell Avenue, Suite 1350, Miami FL 33131; Phone Number – 305.482.8000; E-mail - [miamicompliance@efgam.com](mailto:miamicompliance@efgam.com)