



PRIVACY POLICY

OUR COMMITMENT TO YOUR PRIVACY

Acribus Capital, LLC (“Acribus,” “we,” “our,” or “us”) considers the privacy of our clients to be a fundamental aspect of our relationship. We are committed to safeguarding the personal and financial information you entrust to us and to using it only for appropriate business purposes consistent with applicable laws, including the Gramm-Leach-Bliley Act and Regulation S-P, and the Texas Data Privacy and Security Act.

We do not sell your non-public personal information. We share such information only as permitted or required by law and as necessary to provide advisory services, maintain your accounts, and fulfill regulatory obligations.

INFORMATION WE COLLECT

In the course of providing investment advisory and related services, Acribus may collect non-public personal information (“NPI”) about you, including but not limited to:

- Name, address, phone number, and e-mail address.
- Social Security or taxpayer identification number.
- Date of birth.
- Financial information such as assets, income, account balances, investment activity, and transaction history.
- Banking or brokerage relationships.
- Information provided in applications, agreements, questionnaires, and other forms.
- Information received from third parties such as custodians, broker-dealers, accountants, or attorneys.

We collect this information directly from you, from transactions you conduct with us or with others, and from third parties you have authorized to share it with us.

HOW WE USE YOUR INFORMATION

We use your information to:

- Provide, administer, and service your investment accounts.
- Execute transactions and implement investment recommendations.
- Verify your identity and prevent fraud.
- Maintain regulatory and legal compliance.
- Communicate with you regarding your accounts, reports, and services.
- Manage our internal operations, risk, and recordkeeping.

We use non-public information solely for legitimate business purposes and in a manner consistent with your client relationship.



SHARING OF INFORMATION

Acribus may share non-public personal information in the following limited circumstances:

1. Service Providers and Affiliates – With employees, affiliates, custodians, technology vendors, and other non-affiliated service providers who assist us in servicing your account, provided they are bound by contractual obligations to protect the confidentiality of your information and to use it only for agreed purposes.
2. Joint Marketing or Co-Branded Arrangements – With non-affiliated financial institutions with whom we jointly offer, endorse, or sponsor financial products or services.
3. At Your Direction – When you provide written authorization for us to share information with third parties (e.g., your attorney, accountant, or other adviser).
4. Regulatory and Legal Requirements – When required by law, regulation, subpoena, or court order, or to cooperate with regulatory or law enforcement authorities acting within their legal duties.
5. Corporate Transactions – In connection with a reorganization, merger, or transfer of advisory business, to the extent permitted by law.

We do not disclose your non-public personal information to non-affiliated third parties for their own marketing purposes.

OPT-OUT RIGHTS

Because Acribus does not disclose your non-public personal information to non-affiliated third parties except as permitted by law, an opt-out is generally not required. If at any time our practices change in a way that expands sharing beyond these exceptions, you will receive an updated notice and the opportunity to opt out before any such sharing occurs.

INFORMATION REGARDING FORMER CLIENTS

If you end your client relationship with Acribus, we will retain your information only as needed to comply with legal, regulatory, and recordkeeping obligations. We do not share information about former clients except as permitted or required by law.

SAFEGUARDING YOUR INFORMATION

Acribus maintains physical, electronic, and procedural safeguards that comply with federal and state standards to protect your non-public personal information. These include:

- Multi-factor authentication and password-protected systems.
- Encrypted hardware and software firewalls.
- Secure data backup and restricted access protocols.
- Employee training on information security and confidentiality obligations.

We regularly assess and enhance our cybersecurity and data-protection measures to ensure compliance with the SEC's Safeguards Rule and Texas data security standards.



INCIDENT RESPONSE AND BREACH NOTIFICATION

In accordance with the 2024 amendments to Regulation S-P, Acribus has adopted a written Incident Response Program designed to promptly detect, investigate, and respond to any unauthorized access to or use of customer information.

If sensitive customer information has been, or is reasonably likely to have been, accessed or used without authorization, Acribus will notify affected individuals in writing as soon as practicable, and no later than 30 days after determining that such a breach occurred, except where delayed by law enforcement or other lawful exceptions.

OVERSIGHT OF THIRD-PARTY SERVICE PROVIDERS

Acribus requires service providers with access to client information to maintain appropriate confidentiality, security, and data-protection standards. We conduct reasonable due diligence and maintain written agreements to ensure compliance with applicable privacy and safeguarding requirements.

YOUR RIGHTS UNDER TEXAS LAW

If you are a Texas resident, the Texas Data Privacy and Security Act (TDPSA) grants certain rights regarding your personal data, including the right to:

- Confirm whether we are processing your personal data and access such data;
- Correct inaccuracies in your personal data;
- Delete personal data provided by or obtained about you;
- Obtain a copy of your personal data in a portable format; and
- Opt out of processing for targeted advertising, sale, or profiling.

You may exercise these rights by contacting us at info@acribuscapital.com or calling (214) 810-6002. We will respond in accordance with applicable law.

DELIVERY OF PRIVACY NOTICES

You will receive this Privacy Policy at the inception of your client relationship with Acribus and annually thereafter for as long as you remain a client. If our practices change materially, you will receive an updated notice and, where required, an opportunity to opt out of any new sharing.

RETENTION AND DISPOSAL

We retain non-public personal information for as long as necessary to fulfill the purposes for which it was collected and to comply with legal and regulatory obligations. When no longer required, such information is securely destroyed in accordance with SEC and state guidelines.

QUESTIONS OR CONCERNS

If you have any questions about this Privacy Policy or wish to exercise your rights, please contact:

Acribus Capital, LLC
Attn: Compliance Department
5473 Blair Rd, Ste 100, PMB 246189
Dallas, TX 75231
Phone: (214) 810-6002
Email: info@acribuscapital.com

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