HERITAGE CAPITAL
PRIVATE ASSET MANAGEMENT

A TrueNote Company

December 2018

As a financial institution, we are required to share our privacy practices and our official policy with you annually. Our policy bottom line: We greatly respect your privacy, and our policy has always been to never disclose any of your information to a third party without your consent.

Following are the details of our privacy policy.

HERITAGE CAPITAL PRIVATE ASSET MANAGEMENT PRIVACY NOTICE

TrueNote Investment Advisors, Inc., dba Heritage Capital Private Asset Management ("we") retains non-public information ("NPI") about you from the following sources as a result of the services so requested:

- Investment account applications and forms
- Transactions with us and our affiliates and other chosen investment sponsors
- Other various materials utilized by your representative in order to put forth an appropriate recommendation or to fill a service request

We do not disclose or share any of our customers' or former customers' NPI to unaffiliated third parties unless:

- It is necessary to fulfill a transaction or service request related to your account(s).
- We are required to do so by a regulator, a court of competent jurisdiction, or applicable law.
- Broker/dealer firms have regulatory requirements to supervise some of our firm's activities.
- It is by your request.

As this is our practice, we are not required to have "opt-out" provisions or methods, per the exemptive relief provided under Section 248.13 of the Gramm-Leach-Bliley Act.

We may disclose all information we collect as described above to companies that perform marketing services on our behalf, to those that are service providers, or to other financial institutions with whom we have joint marketing arrangements.

We restrict access to NPI to required personnel in the provision of requested services, and we maintain physical, procedural, and electronic safeguards that comply with federal standards.

Heritage Capital Private Asset Management ("HC") may share client information with broker-dealer firms that have regulatory requirements to supervise certain of HC's activities.

Should you have any questions about our policy, please do not hesitate to call.