

PRIVACY NOTICE

Newground Social Investment ('Newground') recognizes that relationships with current and prospective clients are grounded in integrity and trust. Therefore, all personal/private information furnished shall be treated as confidential and will not be disclosed to third parties except as agreed to in writing or as required by law. Newground does not release personal Client information to anyone outside of Newground and its designated sub-advisors without Client's permission, except as may be authorized in the 'Limited Authorization and Release' section of our Advisory Agreement.

How and Why We Obtain Information

Newground collects information about you to help us serve your financial needs, provide customer service, and fulfill legal and regulatory requirements. Any collection of personal information is to support our normal business operations and to service your financial needs.

Newground collects non-public personal and financial information about you from information you give us. The sources and the information collected may include:

- Conversations & meetings, and information on applications and related forms such as name, address, Social Security number, date of birth, and financial details.
- Information regarding your transactions with us, such as products or services purchased, account balances, and investments made.

Sharing Information

We restrict access to client information to those who need it in order to carry out their business duties. Newground does not disclose non-public personal information about you, except as agreed to in writing. However, in the course of servicing your account we may need to share information collected in order to provide account maintenance or customer service to your account (for example, with an attorney, tax professional, or our sub-advisors); and may be required to disclose your information to organizations such as governmental agencies and law enforcement officials, if required under court order or by law.

Protecting Your Information

We safeguard client information by preventing its unauthorized access, disclosure, or use. Newground maintains physical, electronic, and procedural safeguards to protect your confidential personal information. Arrangements with companies or independent contractors not affiliated with Newground will be subject to confidentiality agreements.

Newground reserves the right to change this Privacy Policy at any time, but will notify clients of modifications that may affect them.

Please do not hesitate to contact us with questions concerning these policies.

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