

PRIVACY NOTICE

Newground Social Investment ("Newground") is committed to protecting the nonpublic personal information of current and prospective clients. This notice describes how we collect, use, share, and safeguard your information.

How and Why We Obtain Information

Newground collects nonpublic personal information about you from the following sources:

- Information you provide on applications, forms, and in conversations and meetings – such as name, address, Social Security number, date of birth, and financial details.
- Information regarding your transactions with us or our service providers – such as products or services used, account balances, and investment activity.

We may use technology tools to assist in documenting meeting notes.

This information is collected to support our normal business operations, to service your financial needs, and to fulfill legal and regulatory requirements.

Sharing Information

Newground does not sell client information. We restrict access to your nonpublic personal information to those who need it to carry out their business duties.

We may disclose your information as permitted or required by law, including to service providers and sub-advisors who assist in servicing your account (for example, custodians, attorneys, or tax professionals), and to governmental agencies or law enforcement officials when required by court order or applicable law. Service providers and sub-advisors who receive client information are expected to maintain its confidentiality.

Protecting Your Information

Newground maintains physical, electronic, and procedural safeguards designed to protect your nonpublic personal information from unauthorized access, disclosure, or use. We also maintain procedures for the proper disposal of records containing client information.

Changes to This Notice

Newground reserves the right to amend this Privacy Notice at any time. Updated notices will be provided as required by applicable law.

Please contact us if you have questions concerning this notice.

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