

NORTHWEST CRITERION ASSET MANAGEMENT, LLC

114 Commons Way
Princeton, New Jersey 08540
609-924-4488

PRIVACY NOTICE

Northwest Criterion Asset Management, LLC (“*Northwest Criterion*”), maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients’ nonpublic personal information (“information”). Through this policy and its underlying procedures, *Northwest Criterion* attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

It is the policy of *Northwest Criterion* to restrict access to all current and former clients’ information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services to the client. *Northwest Criterion* may disclose the client’s information if *Northwest Criterion* is: (1) previously authorized to disclose the information to individuals and/or entities not affiliated with *Northwest Criterion*, including, but not limited to the client’s other professional advisors and/or service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of information contained in any document completed by the client for processing and/or transmittal by *Northwest Criterion* in order to facilitate the commencement/ continuation/termination of a business relationship between the client and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, insurance company, etc.), including information contained in any document completed and/or executed by the client for *Northwest Criterion* (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

Northwest Criterion permits only authorized employees and affiliates who have signed a copy of *Northwest Criterion*’s Privacy Policy to have access to client information. Employees violating *Northwest Criterion*’s Privacy Policy will be subject to *Northwest Criterion*’s disciplinary process. Additionally, whenever *Northwest Criterion* hires other organizations to provide services to *Northwest Criterion*’s clients, *Northwest Criterion* will require them to sign confidentiality agreements and/or the Privacy Policy.

Should you have any questions regarding the above, please contact either Michael A. Camp or Joseph F. Hunt, of *Northwest Criterion*, at 609-924-4488.