

## PRIVACY POLICY

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At Genter Capital Management, we realize that our most valuable asset is our relationship with you. You have trusted us to manage your assets and in turn we will do everything in our capabilities to preserve this trust.

In the course of providing you with our products and services, we may obtain non-public personal information about you. This information may come from sources such as account applications and other forms; transaction information; electronic or verbal information; your brokerage, custodial, or advisory firm; your broker or investment advisor; or from information you provide to us through the Genter Capital Web site.

We do not disclose any non-public personal information about our clients or former clients to any non-affiliated parties except as required or permitted by law. Additionally, your privacy is not for sale and we will not sell your personal information to anyone, for any reason, at any time.

We may provide access to information about you to outside affiliates in certain limited circumstances. This information is necessary in order to process transactions and service your account or to provide you with information about products and services that we believe may be beneficial to you. Our affiliates, in turn, are not permitted to share your information with non-affiliated entities, except as required or permitted by law.

The obligation to safeguard your non-public private information is very important to us. Your personal information is restricted to only those employees who are required to access your information in order to provide services for you. We maintain physical, electronic, and procedural safeguards to protect all nonpublic personal information.