

PRIVACY POLICY

VERATIS ADVISORS, INC.

Privacy Policy / Regulation S-P

January 1, 2021

Policy

Veratis Advisors, Inc. ("Veratis") views protecting private information regarding its clients and potential clients as a top priority. Pursuant to the requirements of the Gramm-Leach-Bliley Act (the "GLBA") and guidelines established by the Securities Exchange Commission regarding the Privacy of Consumer Financial Information (Regulation S-P), Veratis has instituted the following policies and procedures in an effort to ensure that such nonpublic private information is kept private and secure. This policy also outlines what Veratis and its Associated Persons are allowed to use the confidential personal information collected in connection with its advisory activities.

This Privacy Policy covers the practices of Veratis and applies to all nonpublic personally identifiable information, including information contained in consumer reports, of our current and former clients.

Responsibility

The CCO is responsible for administering Veratis' policies on safeguarding and protecting the nonpublic personal information of clients collected by Veratis, and to ensure that nonpublic personal information of Veratis' clients is shared only with Associated Persons and others in a way that is consistent with Veratis' Privacy Notice and the procedures contained in this Policy.

- Each Associated Person has a duty to protect the nonpublic personal information of clients collected by Veratis.
- Each Associated Person has a duty to ensure that nonpublic personal information of Veratis' clients is shared only with Associated Persons and others in a way that is consistent with Veratis' Privacy Notice and the procedures contained in this Policy.
- Each Associated Person has a duty to ensure that access to nonpublic personal information of Veratis' clients is limited as provided in the Privacy Notice and this Policy.
- No Associated Person is authorized to sell, on behalf of Veratis or otherwise, nonpublic information of Veratis' clients.
- Associated Person with questions concerning the collection and sharing of, or access to, nonpublic personal information of Veratis' clients must look to Veratis' CCO for guidance.
- Violations of these policies and procedures will be addressed in a manner consistent with other Veratis disciplinary guidelines.



Associated Persons with questions concerning the collection and sharing of, or access to, nonpublic personal information of Veratis' clients must look to Veratis' CCO for guidance. Violations of these policies and procedures will be addressed in a manner consistent with other Veratis disciplinary guidelines.

Information Practices

Veratis limits the use, collection, and retention of client or potential client information to what we believe is necessary or useful to conduct our business or to offer quality products, services, and other opportunities that may be of interest to our clients or potential clients.

Veratis collects nonpublic personal identifying information about its clients and/or potential clients such as name, address, telephone number, social security number or taxpayer ID number, date of birth, employment status, annual income, and net worth. The information is collected when the client completes account opening documents, signs our agreement for services, and through the client's account custodian or other authorized representatives, e.g. attorney, accountant, bank, etc.

Disclosure of Information to Nonaffiliated Third Parties

Veratis may disclose nonpublic personal information about clients or former clients to certain nonaffiliated third parties. Unless otherwise notified by the CCO, no Associated Person may share such information with unaffiliated third parties on behalf of Veratis without prior written permission. Veratis provides all clients with a privacy policy at the inception of Veratis -client relationship, at any time these policies are revised, and annually thereafter, which allows the client to opt out of the information sharing arrangement.

Types of Permitted Disclosures - The Exceptions

In certain circumstances, Regulation S-P permits Veratis to share nonpublic personal information about its clients with nonaffiliated third parties without providing an opportunity for those individuals to opt out. These circumstances include sharing information with a nonaffiliate (1) as necessary to effect, administer, or enforce a transaction that a client requests or authorizes; (2) in connection with processing or servicing a financial product or a service a client authorizes; and (3) in connection with maintaining or servicing a client account with Veratis.

Service Providers

From time to time, Veratis may have relationships with nonaffiliated third parties (such as attorneys, auditors, accountants, brokers, custodians, and other consultants), who, in the ordinary course of providing their services to us, may require access to information containing nonpublic information. These third-party service providers are necessary for us to provide our investment advisory services. When we are not comfortable that service providers (e.g., attorneys, auditors, and other financial institutions) are already bound by duties of confidentiality, we require assurances from those service providers that they will maintain the confidentiality of nonpublic information they obtain from or through us. In addition, we select and retain service providers that we believe are capable of maintaining appropriate safeguards for nonpublic information, and we will require agreements from our service providers that they will implement and maintain such safeguards.



Processing and Servicing Transactions

Veratis may also share information when it is necessary to effect, administer, or enforce a transaction requested or authorized by clients. In this context, "necessary to effect, administer, or enforce a transaction" includes what is required or is a usual, appropriate, or acceptable method:

- To carry out the transaction or the product or service business of which the transaction is a part, and record, service, or maintain the client's account in the ordinary course of providing the financial service or financial product;
- To administer or service benefits or claims relating to the transaction or the product or service of which it is a part;
- To provide a confirmation, statement, or other record of the transaction, or information on the status or value of the financial service or financial product to the client or the client's agent or broker.

Sharing as Permitted or Required by Law

Veratis may disclose information to nonaffiliated third parties as required or allowed by law. For example, this may include disclosures in connection with a subpoena or similar legal process, a fraud investigation, recording of deeds of trust and mortgages in public records, or an audit or examination.

Provision of Opt Out

As discussed above, Veratis may share nonpublic client information with unaffiliated third parties. Therefore, Veratis will provide the right for its clients to opt out of sharing with nonaffiliated third parties at the inception of the advisor client relationship, and annually thereafter. Upon oral or written request from the client, Veratis will provide a current privacy notice to client for the purposes of revising or rescinding opt out directions.

Where two or more individuals jointly obtain a financial product or service from Veratis, one client can opt out for all associated joint clients or each of the associated joint clients can opt out individually. Not all clients need opt out before implementing opt-out directions for another associated joint client. If one associated joint client opts out and another does not, information may only be shared regarding the individual who did not opt out.

Disclosure of Information to Affiliated Third Parties

Veratis may share information with affiliated parties and shall inform clients, in its privacy notice, of the type of information shared and the category of parties with whom such information is shared. Client information may be shared for legitimate business purposes only.

Privacy Notice

Veratis has developed a Privacy Notice, as required under Regulation S-P, to be delivered to clients initially and to current clients on an annual basis. The notice discloses Veratis' information collection and sharing practices and other required information. The notice will be revised as necessary any time information practices change.



Privacy Notice Delivery

- **Initial Privacy Notice** - As regulations require, all new clients receive an initial Privacy Notice at the time the client relationship is established (i.e., upon execution of the agreement for services).
- **Annual Privacy Notice** - Pertinent regulations require that disclosure of the Privacy Policy be provided to existing clients on an annual basis. Veratis will deliver its annual Privacy Notice in conjunction with the annual offer of its Disclosure Brochure.

Revised Privacy Notice

Regulation S-P requires that Veratis amend its Privacy Policy and promptly distribute a revised disclosure to clients, if there is a change in Veratis' collection, sharing, or security practices.

Joint Relationships

If two or more individuals jointly obtain a financial product or service from Veratis, Veratis may satisfy the initial, annual, and revised notice requirements by providing one notice to those individuals jointly.

