

Privacy Notice

Our Commitment to Your Privacy

Maintaining the trust and confidence of our clients is a high priority. That is why Alessandra Capital Management, LLC ("ACM") wants you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. It is ACM's policy that no private client financial information obtained by us is sold or made available to third parties except that:

- ACM may use third parties to assist in the management or maintenance of client accounts (such as a client's custodian)
- Client information may be released in accordance with applicable laws and regulations

We will not share non-public personal information about our clients with nonaffiliated third parties without prior client consent, except for specific purposes described below. This notice explains how we collect, use and safeguard client information.

How ACM Collects Information

We may obtain information about our clients from various sources as part of providing investment advisory services. These sources include:

- Client agreements and other information that clients provide to us, whether in writing, in person, by telephone, electronically or by any other means. This information may include a client's name, address, phone number, email address, social security number, employment information, income, investment experience, and credit references.
- Personal tax returns provided by the client.
- Transactions on a client's behalf. This information may include the client's account balances, positions, investment interests and history.
- Consumer reporting agencies. This information may include account information and credit history.
- Public sources.

Sharing Information with Nonaffiliated Third Parties

We only disclose non-public client information to nonaffiliated third parties when we believe it necessary for providing services to you or as required or permitted by law, such as:

- If you request or authorize the disclosure of the information
- To provide client account services or account maintenance such as processing your securities transactions, and issuing checks and account statements
- To respond to a subpoena or court order, judicial process, law enforcement or regulatory authorities
- To perform services for the firm or on its behalf to develop or maintain ACM's technical systems and software
- To help us prevent fraud
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm
- In connection with a proposed or actual sale, merger, or transfer of all or a portion of our business or an operating unit
- To comply with federal, state or local laws, rules and other applicable legal requirements
- Pursuant to any other exceptions enumerated in the California Information Privacy Act

For example, we rely on certain third parties for services that are necessary to enable us to provide our investment advisory services to you and your account. These may include our attorneys, auditors, prime brokers and custodians who, in the ordinary course of providing their services to us, may require access to information containing your non-public personal information. We do not disclose client non-public personal information to other companies who may want to sell their products or services to you such as selling client lists or client names to catalogue companies.

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To Whom This Policy Applies

This Privacy Policy applies to individuals who obtain or have obtained services from ACM used primarily for personal, family or household purposes. Our Privacy Policy continues to apply to all former clients.

Opt Out Provision

If, at any time in the future, it is necessary to disclose any client personal information in a way that is inconsistent with this policy, we will give our clients advance notice of the proposed disclosure so that they will have the opportunity to opt out of such disclosure.

Our Security Practices

We take steps to safeguard client information. We restrict access to the personal and account information of our clients to our employees and agents for business purposes only. We maintain physical, electronic and procedural safeguards to guard your personal information. Additionally, we have internal controls to keep client information as accurate and complete as we can. If you believe that any information about you is not accurate, please let us know.

Changes to This Privacy Policy

If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please write to Alessandra Capital Management, LLC, 501 Deep Valley Drive, Ste. 202, Rolling Hills Estates, CA 90274, or phone (310) 377-9220.

Complaints

Should you have any complaints regarding ACM's investment advisory services, please notify us at: Alessandra Capital Management, LLC, 501 Deep Valley Drive, Ste. 202, Rolling Hills Estates, CA 90274, or phone (310) 377-9220.