



## **7Twelve Advisors, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: February 13, 2019**

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of 7Twelve Advisors, LLC (“7Twelve” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (615) 341-0712 or by email at [amartin@7twelveadvisors.com](mailto:amartin@7twelveadvisors.com).

7Twelve is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about 7Twelve to assist you in determining whether to retain the Advisor.

Additional information about 7Twelve and its Advisory Persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 149849.

**7Twelve Advisors, LLC**  
**3100 West End Avenue, Suite 930**  
**Nashville, TN 37203**  
**Phone: (615) 341-0712**  
**[www.7twelveadvisors.com](http://www.7twelveadvisors.com)**

## Item 2 – Material Changes

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Form ADV *Part 2A* (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of 7Twelve.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 149849. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (615) 341-0712 or by email at [amartin@7twelveadvisors.com](mailto:amartin@7twelveadvisors.com).

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## Item 4 – Advisory Services

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### A. Firm Information

7Twelve Advisors, LLC ("7Twelve" or the "Advisor") is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"), which is organized as a Limited Liability Company ("LLC") under the laws of the State of Tennessee. 7Twelve was founded in 2008 and is operated by its President, Andrew D. Martin. The firm is owned by Andrew D. Martin, Steven J. Eisen and Craig L. Israelson. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by 7Twelve to institutional clients of the 7Twelve Balanced Portfolio and future public markets investment products.

### B. Advisory Services Offered

7Twelve primarily provides investment advisory services to an open-end registered investment management company, a unit investment trust and other investment advisors (each referred to as a "Client").

#### 7Twelve Balanced Portfolio

7Twelve provides investment management services to the 7Twelve Balanced Portfolio (the "Fund"), an open-end registered investment management company. Subject to general supervision by the Board of Trustees of the Northern Lights Variable Trust (herein the "Board") and in accordance with the investment objectives, policies and restrictions of the Fund, the Advisor provides the Fund with ongoing investment management and administrative oversight. The Advisor has discretion to determine which securities or other investments to purchase or sell, and what portion of the Fund's assets will be held in various securities, cash or other investment instruments, consistent with the Fund's investment objective and guidelines as set forth in the current prospectus.

7Twelve seeks to achieve the Fund's investment objective by allocating assets among securities that represent 7 broad asset classes and 12 subcategories using the Advisor's 7Twelve asset allocation model (the "7Twelve Model™"). The adviser usually does not select individual stocks and bonds, but instead selects exchange-traded funds ("ETFs") or no load indexed mutual funds that each invests primarily in securities representing one of the 12 subcategories of assets selected under the 7Twelve Model™. The Fund may invest in ETFs that hold securities from issuers of any market capitalization, credit quality, maturity, country, or trading currency. However, bond credit quality will be primarily investment grade (that is, rated Baa3 or higher by Moody's Investors Service, or equivalently rated by another nationally recognized statistical rating organization). The Fund may also buy ETFs that invest in foreign securities traded on exchanges outside the U.S. and through American depositary receipts ("ADRs"). Under normal market conditions, the Fund invests at least 65% of its assets in equity securities (common stocks) and at least 35% of its assets in bonds. For purposes of meeting these allocations, the Fund defines equity securities to include ETFs that invest primarily in equity securities and defines bonds to include ETFs that invest primarily in bonds and other fixed income securities.

#### 7Twelve Balanced Portfolio Series

7Twelve provides investment consulting services to the 7Twelve Balanced Portfolio Series (the "Trust"), a unit investment trust. The Trust is a series trust created by First Trust Portfolios L.P. (the "Sponsor"). Subject to the investment objectives, policies and restrictions of the Trust, the Advisor provides the Trust with ongoing investment consultation and administrative oversight. The Advisor provides the Sponsor, in connection with its sponsorship of the Trust, a list of securities for deposit into the Trust

7Twelve's investment consultation seeks to achieve the Trust's investment objective of above-average capital appreciation. The Trust is a unit investment trust that invests in ETFs that are diversified among multiple asset classes. Unlike a traditional two-asset 60% equities/40% fixed income portfolio, the Trust invests in seven core asset groups, which are subdivided into 12 equal asset classes, in an effort to enhance performance and reduce risk. This investing approach attempts to generate equity-like returns with bond-like risk. Each investment asset adds an important dimension to the portfolio because of the historically low correlation and behavior between them. Approximately 65% of the portfolio is invested in equities and diversifying assets and approximately 35% of the portfolio is invested in fixed income and cash equivalents.

A full description of the services provided by the Advisor for managing the Fund or consulting to the Trust are available in the current prospectus and statement of additional information ("SAI") of the Fund or Trust. The

prospectus and statement of additional information are available from the SEC website ([www.SEC.gov](http://www.SEC.gov)) or by contacting the Advisor at (615) 341-0712.

#### **Model Management**

7Twelve offers Model Management services via Folio Investments, Inc. an internet-based broker-dealer platform and other institutions ((herein "Platform"). 7Twelve has developed two proprietary models, 7Twelve and 3Twelve Models (herein "Models"), both of which are managed in accordance to the Model's investment style and objective, and are available on the Platform to other investment advisors ("Third-Party Advisors"). The 3Twelve Total Bond is an equally weighted, passive strategy that invests in each major taxable bond category. The twelve major asset categories in the global bond universe are the model for the equally-weighted 3Twelve Total Bond strategy.

7Twelve does not have the authority to buy or sell securities for, or otherwise manage, client account[s] managed by a Third-Party Advisor utilizing the Platform ("Third-Party Clients"). The Advisor will not be in direct communication with Third-Party Clients. Any decision to trade, as well as the responsibility for the trade orders, remains exclusively with the Third-Party Advisor and the Third-Party Client. 7Twelve relies exclusively on Third-Party Advisors for (i) making suitability decisions, and (ii) for providing "ongoing investment supervisory services," based on the needs and circumstances of the Third-Party Clients.

#### **C. Client Account Management**

##### **7Twelve Balanced Portfolio Fund**

Shares of the Fund are only issued through insurance company intermediaries for variable insurance policies. An investor cannot invest directly in the Fund. Subscription details are provided in the Fund's prospectus and other disclosure documents provided by various insurance companies.

##### **7Twelve Balanced Portfolio Series**

Units of the Trust are only issued through the Sponsor. Subscription details are provided in the Trust's prospectus and other disclosure documents provided by the Clients selected Custodian.

#### **D. Wrap Fee Programs**

7Twelve does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by 7Twelve.

#### **E. Assets Under Management**

As of December 31, 2018, 7Twelve manages \$60,000,000 in discretionary assets for the 7Twelve balanced portfolio. 7Twelve administers \$5,000,000 for the unit investment trust. Clients may request more current information at any time by contacting the Advisor.

### **Item 5 – Fees and Compensation**

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#### **A. Fees for Advisory Services**

##### **7Twelve Balanced Portfolio Fund**

Fees charged to mutual fund clients are set by the Board and shareholders of the Fund and are subject to review and approval as provided by the Investment Company Act of 1940, as amended (the "1940 Act"). For its investment management services to the Fund, the Advisor receives an investment management fee calculated as a percentage of average daily assets of the Fund at an annual rate of 0.15% per annum. Fees are calculated daily and paid to 7Twelve monthly in arrears. The Fund will incur other operating expenses payable to the Fund's other service providers. Fees are negotiated separately on behalf of each series and approved annually at an in-person meeting of the Boards. The Fund pays the Advisory Fees monthly. The Board must annually approve any Advisory contract for the Fund. Additional information regarding the fees and expenses of the Fund are detailed in the Fund's prospectus.

##### **7Twelve Balanced Portfolio Series**

The Sponsor shall cause the Trust to pay to the Advisor \$0.02 per Unit calculated and paid one time at the close of the initial offering period of the Trust. Payment of the fee due to the Advisor with respect to the Trust shall be made as soon as practicable but no later than 30 calendar days after the end of the Trust's initial offering period.

#### Model Management Services

7Twelve receives a fixed annual fee of up to 0.50% based on average daily balance, quarter-end, or month-end market value of assets placed on the Platform within the Advisor's Models ("Billable Value").

### **B. Fee Billing**

#### 7Twelve Balanced Portfolio Fund

Investment management fees are accrued daily and paid monthly to the Advisor at the end based on the average assets during the month. The investment management contract between 7Twelve and the Fund is reviewed annually for approval by the Board. Additional information regarding the fees and expenses of the Fund are detailed in the Fund's prospectus.

#### 7Twelve Balanced Portfolio Series

The Sponsor shall cause the Trust to pay to the Advisor \$0.02 per Unit calculated and paid one time at the close of the initial offering period of the Trust. Payment of the fee due to the Advisor with respect to the Trust shall be made as soon as practicable but no later than 30 calendar days after the end of the Trust's initial offering period.

#### Model Management Services

Model management fees may be payable in advance or in arrears, on a monthly or quarterly basis ("Billing Period"), and based on the Billable Value of Third-Party Client assets placed on the Platform within the Advisor's Models. Fees for the applicable Billing Period are based upon multiplying the Billable Value of the Third-Party Client accounts by four (for quarterly billing) or twelve (for monthly billing).

### **C. Other Fees and Expenses**

Clients may incur additional account fees as shareholders in the Fund or Trust. These fees are described in the prospectus for the Fund or Trust.

### **D. Advance Payment of Fees and Termination**

#### 7Twelve Balanced Portfolio Fund

7Twelve is compensated for its services at the end of the month after investment advisory services have been rendered. Clients may redeem their shares in the Fund at net asset value, pursuant to the guidelines set forth in the Fund's prospectus and the provisions of the insurance company variable contracts.

#### 7Twelve Balanced Portfolio Series

7Twelve is compensated for its services as soon as practicable but no later than 30 calendar days after the end of the Trust's initial offering period. Clients may redeem all or a portion of their Units at any time by sending a request for redemption to their Custodian through which they hold the Units.

#### Model Management Services

7Twelve may be compensated for its services either in advance or at the end of the Billing Period. Either party may terminate the model management agreement with 90 days written notice to the other party. The Advisor will refund any unearned, prepaid model management fees from the effective date of termination to the end of the Billing Period. The model management agreement with the Advisor is non-transferable without prior written consent by both parties.

### **E. Compensation for Sales of Securities**

7Twelve does not buy or sell securities to earn securities commissions and does not receive any compensation for securities transactions in any Client account, the Fund, or Trust, other than the investment management fees noted above. Mr. Andrew Martin is also registered representative of Silver Oak Securities, INC. ("Silver Oak Securities"). Silver Oak Securities is a registered broker-dealer (CRD No. 46947), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Martin may receive additional compensation for investments implemented in his separate capacity with Silver Oak Securities. Please see Item 10 below.

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#### **7Twelve Advisors, LLC**

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## **Item 6 – Performance-Based Fees and Side-by-Side Management**

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7Twelve does not charge performance-based fees for its investment advisory services. The fees charged by 7Twelve are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

As noted above, 7Twelve Advisors, LLC provides investment management services to the 7Twelve Balanced Portfolio, an open-end registered investment management company, and the 7Twelve Balanced Portfolio Series, a unit investment trust. Clients should refer to the offering documents for details on the performance allocation. The fund or trust manager does not receive a performance allocation from either the 7Twelve Balanced Portfolio or the 7Twelve Balanced Portfolio Series.

## **Item 7 – Types of Clients**

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7Twelve primarily provides investment advisory services to the Fund, Trust and other investment advisors. The minimum initial investment and the minimum subsequent investment is detailed in the prospectus of the Fund or Trust.

## **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

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### **A. Methods of Analysis**

7Twelve primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from 7Twelve are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted in Item 4 above, the 7Twelve Portfolio consists of twelve (12) equally weighted investments representing seven (7) asset classes. The Advisor selects the underlying index-based investments based on its internal due diligence processes.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. More information about the investment policies and risks of the Fund or Trust can be found in their respective prospectus.**

## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving 7Twelve or any of its Supervised Persons.** 7Twelve and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to



perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 149849.

## **Item 10 – Other Financial Activities and Affiliations**

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### Investment Adviser Representative and Broker-Dealer Affiliation

As noted in Item 5.E., Mr. Martin is also a registered representative of Silver Oak Securities. Additionally, Mr. Martin is an investment adviser representative of Silver Oak Securities. In his separate capacity as a registered representative, Mr. Martin will typically receive commissions for the implementation of recommendations for commissionable transactions. In his separate capacity as an investment adviser representative, Mr. Martin will typically provide investment management services to retail clients. Clients are not obligated to implement any recommendation provided by Mr. Martin. Neither 7Twelve nor Mr. Martin, as an IAR of 7Twelve, will earn ongoing investment advisory fees in connection with any services implemented in Mr. Martin's separate capacity as an investment adviser representative and a registered representative. Shareholders of the fund are not solicited for the services provided by Mr. Martin as a registered representative and investment advisor representative.

### Insurance Agency Affiliations

Mr. Martin is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from his role with 7Twelve. As an insurance professional, Mr. Martin may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Martin is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Martin or the Advisor.

## **Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading**

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### **A. Code of Ethics**

7Twelve has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with 7Twelve (our "Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. 7Twelve and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of 7Twelve Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (615) 341-0712 or via email at [amartin@7twelveadvisors.com](mailto:amartin@7twelveadvisors.com).

### **B. Personal Trading with Material Interest**

7Twelve allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. 7Twelve does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. 7Twelve may have an interest or position in certain securities, which may also be recommended to you.

### **C. Personal Trading in Same Securities as Clients**

7Twelve allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades



are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by 7Twelve requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer (“CCO”) or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

#### **D. Personal Trading at Same Time as Client**

While 7Twelve allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will 7Twelve, or any Supervised Person of 7Twelve, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

7Twelve serves as the Advisor to the Fund pursuant to the advisory agreement approved by the Board, and investment consultant to the Trust pursuant to the consultant agreement approved by First Trust. 7Twelve is responsible for buying and selling securities on behalf of the Fund determining the amount of securities to be bought and sold, which broker-dealers to utilize, and negotiate commissions to be paid. Broker-dealers are selected if they have the capability to execute transactions on behalf of the Fund using its best efforts to seek the best overall terms available. All factors are considered in the selection process including but not limited to, the breadth of the market in the security, the price of the security, the financial condition and execution capability of the broker-dealer, anonymity and confidentiality, promptness, the quality of any research provided, the net results of specific transactions, the difficulty in the execution, the size of the order, the operational facilities of the broker-dealer, the broker-dealer's risk, and the reasonableness of commissions. As noted in Item 4, the Advisor provides the Trust's Sponsor, a list of securities for deposit into the Trust.

Following are additional details regarding the brokerage practices of the Advisor for the Fund:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **7Twelve does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - 7Twelve does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

**3. Directed Brokerage** - Brokerage relationships are established by the Advisor and reported to the Fund's Board.

### **B. Aggregating and Allocating Trades**

7Twelve retains a fiduciary obligation to manage Models fairly and equitably and so must ensure that 7Twelve does not “front run” the Model or self-deal with respect to any securities in such accounts on the Platform. If any change in the Models result in purchases or sales of securities for the Model at a time when 7Twelve may engage in transactions for the Fund, the Manager shall provide notice of such change to the Platform in a trading rotation with the Fund, with the Model occupying a place in such rotation as if the Model were a directed brokerage account managed by 7Twelve that does not allow step outs. As a result of this rotation, the Model may trade after the Fund and Trust and may receive less favorable execution.

Investment management and trading practices of the Fund are performed by the Advisor. Additional information is contained in the prospectus and SAI of the Fund.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Investments in the Fund are monitored on a regular and continuous basis by Mr. Martin, President of 7Twelve. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client. Reviews for consulting engagements will vary depending on the terms of the agreement and the nature of the services to be provided.

### **B. Causes for Reviews**

Additional information is contained in the prospectus and SAI of the Fund or Trust.

### **C. Review Reports**

At any time, a shareholder may receive general information regarding the Fund by calling (877) 525-0712. Additionally, shareholders may check their Fund account balances by reviewing the statements they receive from their respective insurance company. Shareholders for the Trust may review statements provided to them from the brokerage account where their shares are held. 7Twelve has no access to individual shareholder values for either the Fund or the Trust.

## **Item 14 – Client Referrals and Other Compensation**

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### **A. Compensation Received by 7Twelve**

7Twelve does not receive any additional compensation.

### **B. Client Referrals from Solicitors**

7Twelve does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

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7Twelve does not accept or maintain custody of any Client accounts. All Clients must place their assets with a “qualified custodian”. The custodian for the Fund is determined by the Board. The custodian for the Trust is determined by the Sponsor. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

## **Item 16 – Investment Discretion**

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7Twelve generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by 7Twelve. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by 7Twelve will be in accordance with each Client's investment objectives and goals.

## **Item 17 – Voting Client Securities**

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7Twelve will vote proxies on behalf of the Fund based on the proxy voting guidelines approved by the Board and will report the voting record of the Fund to the Board. 7Twelve will not vote proxies for the Trust. Instead, the trustee holds the securities on behalf of the unit holders and votes the proxies.

## Item 18 – Financial Information

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Neither 7Twelve, nor its management have any adverse financial situations that would reasonably impair the ability of 7Twelve to meet all obligations to its Clients. Neither 7Twelve, nor any of its advisory persons, have been subject to a bankruptcy or financial compromise. 7Twelve is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

## Privacy Policy

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Effective: February 13, 2019

### Our Commitment to You

7Twelve Advisors, LLC ("7Twelve" or the "Advisor") is committed to safeguarding the use of your personal information of our Clients ("also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust. 7Twelve (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

We do not sell your non-public personal information to anyone. Nor does 7Twelve provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

### The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

### Information About You That 7Twelve Shares

7Twelve works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy 7Twelve's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

**To repeat, we do not sell your non-public personal information to anyone.**

**Information About Former Clients**

7Twelve does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

**Confidentiality and Security**

Our Supervised Persons are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

**We'll Keep You Informed**

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (615) 341-0712 or via email at [amartin@7twelveadvisors.com](mailto:amartin@7twelveadvisors.com).

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**7Twelve Advisors, LLC**

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