

## Privacy Notice

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The following Privacy Policy describes the standards and precautions that Mavros Capital Management, LLC (the “Firm”) follows for the collection, use, and protection of nonpublic personal information concerning its clients and to prevent its inappropriate disclosure to third parties. “Nonpublic personal information” is nonpublic information that is obtained in connection with the provision of a financial product or service for personal, family, or household purposes. Under federal law and SEC regulations, the Firm is required to provide you with a notice of the Privacy Policy.

### **Information the Firm Collects**

The Firm collects nonpublic personal information about you from the following sources:

- information from your profile sheet, applications, and other forms including subscription documents for private investments, investment advisory agreements, and questionnaires, which may include your name, address, social security number, income, net worth, asset statement, tax circumstances, investment experience, investment goals, and risk tolerance;
- information received in the course of your relationship with the Firm, such as products purchased, information about additions and withdrawals, parties to a transaction, positions held or sold and pricing;
- correspondence (written, telephonic, or electronic) with you or third parties (e.g., brokers, custodians, etc.); and
- information about transactions within your managed accounts.

### **Information the Firm Discloses**

The Firm treats your nonpublic personal information in a confidential manner and restricts access to those employees and agents of the Firm that need to know that information in order to provide services to you. The Firm may disclose such information to its affiliates and to service providers and financial institutions that provide services to you.

The Firm does not disclose any nonpublic personal information that it collects to nonaffiliated third parties, except as described in this Privacy Policy or as expressly permitted by you or law and regulation. In the normal course of business, personal information collected may be shared with nonaffiliated third-party service providers as necessary: (1) to effect, administer, or enforce a transaction that you may request or authorize (e.g., disclosures to your broker to assist in processing a transaction); (2) in connection with processing or servicing a financial product or service that you may request (e.g., disclosures to your custodian); or (3) in connection with maintaining or servicing your account with the Firm (e.g., disclosures to third parties performing general administrative activities such as provision of account statements).

The Firm treats nonpublic personal information concerning the Firm’s former clients the same way it treats such information about current clients. The Firm does not sell any personal information about clients to any third party.

If you prefer that the Firm not disclose your nonpublic personal information to nonaffiliated third parties, you may opt out of such disclosure. This means that you may direct the Firm not to disclose your nonpublic personal information to nonaffiliated third parties, subject to the Firm's rights under applicable law to disclose your nonpublic personal information despite you opting out. If you wish to opt out, you may contact Isaac Richard III at [info@mavroscapitalgroup.com](mailto:info@mavroscapitalgroup.com) or (424) 324-2631. You may exercise this right to opt out at any time. State laws may also give you additional rights to limit disclosure of your information.

### **Protecting Confidentiality and Security**

The Firm maintains physical, electronic, and procedural safeguards that comply with federal standards to protect your nonpublic personal information, and that the Firm believes these measures are adequate to prevent unauthorized disclosure of such information.

Additionally, the Firm educates employees on the importance of protecting the privacy and security of confidential personal information.

The Firm will require third-party service providers and financial institutions that receive your nonpublic personal information:

- to protect the confidentiality of your nonpublic personal information and to use the information only for the purposes for which it is disclosed to them;
- to maintain policies and procedures designed to assure only appropriate access to, and use of information about, you; and
- to maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

If you have any questions concerning this Privacy Policy, please contact Isaac Richard III, at [info@mavroscapitalgroup.com](mailto:info@mavroscapitalgroup.com) or (424) 324-2631.