

Greenrock Research, Inc. Privacy Policy

Greenrock Research, Inc. is committed to maintaining the confidentiality, integrity and security of personal information entrusted to us by current, former and prospective clients. We respect client privacy and want to make clear how we implement our privacy policy to serve our client advisory firms as well as their individual clients.

Greenrock Research does not sell any personal client information to third parties. However, we do collect nonpublic personal information on the clients of our client advisory firms for the sole intent of providing investment research services and select administrative services.

Such nonpublic information could include:

- Information regarding individual investors we receive from client advisory firms on applications or custodial forms.
- Information we receive from client advisory firms that may include client lists, account holdings, current allocations, account balances.
- Information we view on custodial systems or receive from our affiliates regarding transactions, fees, purchases, deposits, etc.

We do not disclose nonpublic personal information about our client advisory firms or their individual clients to any third parties except as permitted by law, or as specifically requested by our client firms. Examples of when Greenrock may share nonpublic personal client information could include:

- Disclosing information to a third-party financial service provider, such as a custodian or a sub-advisor, in order to process account transactions that our client advisory firm requests or authorizes in the ordinary course of business.
- Disclosing information to regulators or law enforcement authorities in order to comply with a properly authorized civil, criminal, or regulatory investigation, or subpoena or summons by federal, state or local authorities.

In any case that nonpublic personal information is disclosed, the third party is not permitted to use the information for any other purpose than assisting in the servicing of accounts or as permitted by law.

We restrict access to nonpublic client information to authorized Greenrock employees, our affiliates and their employees. We maintain strict physical, electronic and procedural safeguards to protect all nonpublic client information.

For questions regarding this policy, or to request additional copies of this notice, please contact Greenrock Research, Inc. at 312.463.1301 or email operations@greenrockresearch.com

Dated: March 2022