

## Client Privacy Policy Disclosure

Hanseatic Management Service, Inc. (“Hanseatic”) requires that you provide current and accurate financial and personal information. Hanseatic will protect the information you have provided in a manner that is safe, secure and professional. Hanseatic and its employees are committed to protecting your privacy and to safeguarding that information.

### Safeguarding Client Documents

We collect nonpublic client data in checklists, forms, in written notations, and in documentation provided to us by our clients for evaluation, registration, licensing or related consulting services. We also create internal lists of such data. Hanseatic has established appropriate standards relating to administrative, technical and physical safeguards for client records and information. We utilize password protection and firewalls to limit access from external sources to computers that maintain client files electronically. During regular business hours access to client records is monitored so that only those with approval may access the files. During hours in which the company is not in operation, the computers with access to client records will be locked.

No individual who is not so authorized shall obtain or seek to obtain personal and financial client information. No individual with authorization to access personal and financial client information shall share that information in any manner without the specific consent of a firm principal. Failure to observe Hanseatic’s procedures regarding client and consumer privacy will result in discipline and may lead to termination.

### Sharing Nonpublic Personal and Financial Information

Hanseatic is committed to the protection and privacy of its clients’ and consumers’ personal and financial information. Hanseatic will not share such information with any affiliated or nonaffiliated third party except:

- When necessary to complete a transaction in a client account, such as with the clearing firm or account custodians;
- When required to maintain or service a client account;
- To resolve client disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the client;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- In connection with a sale or merger of Hanseatic’s business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- To comply with federal, state or local laws, rules and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement; or
- In any circumstances with the client’s instruction or consent;

### Opt-Out Provisions

It is not a policy of Hanseatic to share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service client accounts or is mandated by law, there are no allowances made for clients to opt out.