

FINANCO PRIVACY NOTICE

Financo seeks to maintain the highest standards of confidentiality to safeguard the privacy of each of our clients (“Clients”). This Privacy Notice is for the benefit of any Client who obtains financial services from us, in accordance with Title V of the Gramm-Leach-Bliley Act of 1999 and its implementing regulations.

Information About Individuals Associated with a Client

The non-public personal information we may retain about any individual associated with a Client (“Information”) comes primarily from any engagement agreements, due diligence, e-mails, or other documents that a Client may submit to us. We may also internally record Information about Client experiences with us, our affiliates, and others relating to the services or products we provide.

Our Privacy Policies

We do not disclose Information to anyone, except as permitted or required by law. Thus, we may share Information (a) with our affiliates, in order to bring a Client the full range of services and products available from Financo, (b) with non-affiliated companies, in order to manage Client transactions with us or our affiliates or to perform other support services for a Client. Additionally, we may disclose Information if a Client gives its specific consent or instruction to us, or if the disclosure is required by law or regulations.

Our privacy policy applies to current and former Clients, as well as potential future Clients.

Our Internal Information Security

We limit access to Information to those of our staff and service providers who are involved in offering or administering the services that we offer. We maintain physical, electronic, and procedural safeguards designed to comply with federal standards to protect Information. We value our relationship with each Client and want to assure you that maintaining each Client’s privacy is important to us. If you have any question, please call Edward McCabe - our Chief Compliance Officer - at emcabe@arc-sysllc.com.