

BALANZ ADVISORS LLC

PRIVACY NOTICE

Effective: June 1st, 2023

This notice describes the privacy policy of Balanz Advisors LLC ("Balanz Advisors" and the "Privacy Policy", respectively) regarding how we handle and protect personal information that is received about our prospective, current, or former clients or fund investors. Balanz Advisors collects personal information primarily to provide investment management services, communicate information about its products and services and process subscriptions in private investment vehicles that it may advise or sub-advise. Personal information, which may be obtained from discussions with you and documents you may deliver to Balanz Advisors, may include your name, address, telephone number, social security number or tax identification number, assets, net worth, income, bank account information and occupation (collectively, "Personal Information").

Balanz Advisors permits only authorized individuals, who have been advised as to the proper handling of investor information, and who need to access this information to perform services, to have access to this information. These authorized individuals are required to maintain and protect the confidentiality of Personal Information. Balanz Advisors maintains physical, electronic and procedural safeguards to protect Personal Information.

In order to service your investments and process transactions for your investments, Balanz Advisors may provide Personal Information to its affiliates and to non-affiliated third-party financial service providers that assist Balanz Advisors in servicing your investments and have a need for such information, such as a broker-dealer, administrator, or registrar and transfer agent. In addition, Balanz Advisors may share Personal Information with non-affiliated third-party non-financial service providers, in order to process or service transactions or products. Unaffiliated third parties in this instance may include service providers such as publishers and printers. Any such contract entered by Balanz Advisors will include provisions designed to ensure that the third-party will uphold and maintain Balanz's privacy standards when handling Personal Information. Balanz Advisors may also disclose Personal Information to regulatory authorities as required or permitted by applicable law. Balanz Advisors does not otherwise provide information about you to outside firms, organizations or individuals except at your instruction or with your consent or to Balanz Advisors' attorneys, accountants and auditors and as permitted by applicable law.

Except as described in this Privacy Policy, Balanz Advisors will not use Personal Information for any other purpose unless Balanz Advisors describes in advance how such Personal Information will be used and you are given an opportunity to decline approval of such use of your Personal Information.

Balanz Advisors ("us", "we", or "our") provides investment advisory and portfolio management services to domestic and foreign individuals, trusts, family offices, institutional and corporate clients (the "Service").

We use your Personal Information to provide and improve our Service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from <http://www.balanz.us>.

This notice informs you of our policies regarding the collection, use, and disclosure of Personal Information when you use our Service and the choices you have associated with that Personal Information.

Definitions

Service - Service is the advisory and portfolio management services provided by Balanz Advisors to its clients, pursuant to an Investment Advisory Agreement or a similar contract.

Personal Information - Personal Information means data about an individual that may include name, address, telephone number, social security number or tax identification number, assets, net worth, income, bank account information and occupation.

Usage Data - Usage Data is any data about how a product or service is used.

Cookies - A cookie is a piece of data from a website that is stored within a web browser that the website can retrieve at a later time. Cookies are used to tell the server that users have returned to a particular website. When users return to a website, a cookie provides information and allows the site to display selected settings and targeted content.

Data Controller - Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any Personal Information are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personal Information.

Data Processors (or Service Providers) - Data Processor (or Service Provider) means any natural or legal person who processes the Personal Information on behalf of the Data Controller. We may use the services of various Service Providers in order to process your Personal Information more effectively.

Data Subject (or User) - Data Subject is any living individual or legal entity who is using our Service and is the subject of Personal Information.

Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you. Information may be used among companies that perform support services for us, such as data processors, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- To protect your accounts from unauthorized access or identity theft.
- To process your requests such as securities purchases and sales.
- To establish or maintain an account with an unaffiliated third party, such as a clearing broker-dealer providing services to you and/or Balanz Advisors.
- To service your accounts, such as by issuing checks and account statements.
- To comply with Federal, State, and Self-Regulatory Organization requirements.
- To keep you informed about financial services of interest to you.

Types of Data Collected

Personal Information

In providing products and services to you, we collect nonpublic Personal Information that can be used to contact or identify you from the following sources:

- Information we receive from you on applications or other forms (e.g. investment advisory agreements, new account forms, and other forms and agreements);
- Information about your transactions with us or others (e.g. broker/dealers, clearing firms, or other chosen investment sponsors); and
- Information we receive from consumer reporting agencies (e.g. credit bureaus), as well as other various materials we may use to put forth an appropriate recommendation, or to fill a service request.

Personal identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number

- Address, State, Province, ZIP/Postal code, City

We may use your Personal Information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any communication we send.

In the event of a change to your contact Personal Information, please notify Balanz Advisors immediately, using the contact channels provided in the “Contact Us” section of this Privacy Policy.

Use of Personal Information

Balanz Advisors uses the collected Personal Information for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about, unless you have opted not to receive such information

Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), Balanz Advisors legal basis for collecting and using the Personal Information described in this Privacy Policy depends on the Personal Information we collect and the specific context in which we collect it.

Balanz Advisors may process your Personal Information because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests, and it's not overridden by your rights
- We have to comply with applicable law

Retention of Personal Information

Balanz Advisors will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws, including but not limited to the U.S. Investment Advisory Act of 1940), resolve disputes, and enforce our legal agreements and policies.

Balanz Advisors will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

Transfer of Personal Information

We may disclose Personal Information that we collect in accordance with this Privacy Policy in order to service client accounts and effect client transactions. Balanz Advisors does not sell customer lists and will not sell your name to telemarketers.

We will not disclose Personal Information regarding you or your account with us, except under the following circumstances:

- To affiliates and/or third parties that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company;
- To consumer reporting agencies;
- To third parties who perform services or marketing on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To accountants, lawyers, and others as directed in writing;
- To specified family members as directed in writing, or as authorized by law;
- To our attorneys, accountants, consultants and auditors; and
- To government entities, self-regulatory organizations, or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

Your information, including Personal Information, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Information, to the United States and process it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Balanz Advisors will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Information will take place to an organization or a country unless there are adequate controls in place including the security of your data and Personal Information.

Disclosure of Data

Disclosure for Law Enforcement

Under certain circumstances, Balanz Advisors may be required to disclose your Personal Information if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Legal Requirements

Balanz Advisors may disclose your Personal Information in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of Balanz Advisors
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of users of the Service or the public
- Protect against legal liability

Security of Personal Information

The security of your data is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. To protect your personal information from

unauthorized access and use, we maintain physical, electronic, and procedural security measures to safeguard confidential client information. These measures include computer safeguards and secured files and buildings. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Balanz Advisors aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Information.

If you wish to be informed what Personal Information we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- **The right to access, update or to delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Information directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you at the address provided below in the Contact Us section of this document.
- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Information.
- **The right of restriction.** You have the right to request that we restrict the processing of your Personal Information.
- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where Balanz Advisors relied on your consent to process your Personal Information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Information. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. Any contract entered into by Balanz Advisors will include provisions designed to ensure that the Service Provider will uphold and maintain Balanz Advisors' privacy standards when handling Personal Information.

Web-Site Links to Other Sites

Our website may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy

of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Closed or Inactive Accounts

If you decide to close your account(s) or become an inactive client, our Privacy Policy will continue to apply to you.

Children's and Minors' Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from children without verification of parental consent, we take steps to remove that information from our servers.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Complaint Notification

Please direct complaints to: Compliance Department at Balanz Advisors, 2811 Ponce de Leon Blvd., Suite 710, Coral Gables, Florida, 33134, Phone: +1 786 292 7009

Contact Us

If you have any questions about this Privacy Policy, please contact us:

By email at: info@balanz.us

By phone: +1 786 292 7009