

PRIVACY POLICY NOTICE

Inverness is committed to protecting the confidentiality of the information you provide to us. We recognize that protecting the privacy and security of the non-public personal information that we obtain about you is an important responsibility and we want you to understand what information is obtained, how we use it, and how your privacy is safeguarded.

INFORMATION ABOUT YOU THAT WE COLLECT

We collect certain non-public personal information about you from the information that you provide via consultations, our investment advisory agreement, investment financial profiles and other information that is provided to us in writing, in person, by telephone, electronically or by any other means. This information includes biographical information, social security numbers, financial and investment qualifications and transactions (including account balances, investments, withdrawals, asset transfers, legal and accounting issues). This information may be of a personal, familial or financial nature.

OUR USE OF INFORMATION ABOUT YOU

We may share information about you with certain non-affiliated third parties, including service providers, non-financial companies and others, in an effort to manage your accounts, provide professional services, conduct our business and market our services to you. We do not disclose any non-public personal information about you to anyone except as permitted by law or regulation. You may also have certain other privacy protections under applicable state laws. To the extent that these state laws apply, we will comply with them when we share information about you. We follow the same policy with respect to non-public personal information received from clients and former clients.

THE CONFIDENTIALITY, SECURITY AND INTEGRITY OF YOUR NON-PUBLIC PERSONAL INFORMATION

We restrict access to non-public personal information about you to those employees who need to know that information in order to provide services to you. We maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your non-public personal information.

Since we value our relationship with you, we will not disclose non-public personal information about you to non-affiliated third parties except as described above and as permitted by law.

CHANGES TO OUR PRIVACY NOTICE

Inverness reserves the right to change this Privacy Notice at any time, subject to applicable law. This Notice complies with applicable federal laws regarding privacy. Clients may have additional rights under other applicable foreign or state laws.

FURTHER INFORMATION

Please contact Charles Riviezzo, Chief Compliance Officer, at (212) 207-2102, or by email at criviezzo@invernesscounsel.com, with any questions about this Notice or the privacy of your information.