

ANNUAL PRIVACY POLICY

Our Commitment to You

Colrain Capital LLC (“Colrain”) is committed to maintaining the confidentiality and security of your personal information. Colrain does not sell your personal information to anyone. Instead, we use your information primarily to execute transactions on your behalf. Because your personal and financial data is your private information, we hold ourselves to the highest standards in its safekeeping and use, and want you to know how we collect, and safeguard that information. Please read through the policies and procedures that Colrain has implemented to secure and protect your personal data and information.

The Information We Collect About You

You typically provide personal information when you complete a Colrain account application, or when you request a transaction that involves Colrain or one of the Colrain affiliated companies. This information may include your:

- Social Security number or taxpayer identification number
- Custodial accounts, balances, holdings, and objectives
- Your personal address, e-mail address, date of birth, and phone number(s)
- Your signature, as well as authorized representatives (attorneys, accountants)

How We Handle Your Personal Information

Colrain does not sell information about current or former clients or their accounts to third parties. Nor do we share such information, except when necessary to execute transactions on your behalf. The following are the situations in which Colrain may disclose personal information to third parties:

- In certain instances, we may contract with nonaffiliated companies to perform services for us. Where necessary, we will disclose information we have about you to these third parties. In all such cases, we provide the third party with only the information necessary to carry out its assigned responsibilities and only for that purpose. Additionally, we require these third parties to treat your private information with the same high degree of confidentiality that we do.
- We will release information about you if you direct us to do so or if we are compelled by law to do so, including compliance persons assessing our procedures with industry standards. We will notify you if we are required by law to release your information.

How We Secure Your Personal Information

Colrain restricts access to information about you and your account(s) to those Colrain employees who need to know the information to provide products or services to you. We maintain strict physical, electronic, and procedural safeguards to protect your personal information, which also comply with federal law.

How We Keep You Informed

As required by federal law, we will notify clients of our Privacy Policy annually. Should we make any material changes to the policy about maintaining or disclosing information, we will provide notice to you prior to implementation.