



Capita Financial Network, LLC takes precautions to maintain the privacy of personal information concerning its clients. These precautions include the adoption of certain procedures designed to maintain and secure such clients nonpublic personal information from inappropriate disclosure to third parties. Federal regulations require Capita Financial Network, LLC to inform clients of this privacy policy.

Capita Financial Network, LLC collects nonpublic personal information about its clients from the following sources:

- Information from the client profile sheet, and other forms and questionnaires, as well as other communications with clients about potential investment opportunities.
- Information received in the course of a client's relationship with Capita.
- Information about transactions within the managed accounts.

Capita Financial Network, LLC does not disclose any nonpublic personal information about its prospective, existing or former clients or investors to anyone, except as permitted by law and regulation.

Capita Financial Network, LLC restricts access to nonpublic personal information about its clients to those employees and agents of Capita Financial Network, LLC who need to know that information in order to provide services to its clients. Capita Financial Network, LLC may also disclose such information to its affiliates and to service providers and financial institutions that provide services to clients. Capita Financial Network, LLC will require such third-party service providers and financial institutions to protect the confidentiality of the client's nonpublic personal information and to use the information only for purposes for which it is disclosed to them. Capita Financial Network, LLC maintains physical, electronic, and procedural safeguards that comply with federal standards to safeguard the client's nonpublic personal information and which Capita Financial Network, LLC believes are adequate to prevent unauthorized disclosure of such information.

If you have any questions concerning this privacy policy, please contact Mr. Lucas Allen, Chief Compliance Officer, at 801-566-5058.