



First Ascent Asset Management

Privacy and Security Statement

How We Use and Protect Personal Information

Protecting your privacy is very important to us. We value your trust. We want you to understand what information we collect, how we protect it and how we may use it. We treat Nonpublic Personal Information ("NPI") with respect and in accordance with this Privacy Policy.

- We do not sell information about you.
- We do not share your information for marketing purposes.

Information We May Collect

We may obtain NPI to provide you with the services you have requested and improve and/or personalize those services. We may collect NPI from you, from your transactions with us, and from outside parties. This NPI may include:

- Your name, address, phone number, social security number, e-mail address, assets, spouse/dependents/beneficiaries' names (if applicable), and date of birth.
- Information about your account activity including transactions, balances, positions and history, as well as information about your relationship with outside companies, such as brokerage and custodial firms and your financial advisor.
- Information about your investment goals, tolerance for risk, asset allocation, performance history, and investment time horizon.
- Information about your browser type, operating system, Internet Protocol (IP) address, domain name, and/or a date/time stamp for your visit to our website.
- Information relating to your employment, income, finances and other personal characteristics.

Any person who provides us NPI on behalf of another person represents that they have the right and authority to provide such information to us.

Information Disclosed to Third Parties

We do not share any of your NPI with parties unaffiliated with First Ascent other than as described below.

- In order to provide the services to you and process your transactions, it is necessary from time to time for us to disclose your NPI to investment managers, custodians, clearing firms, and their representatives and other companies that provide certain services to us.

These companies are required to treat your NPI with the same high degree of confidentiality that we do and only for the services for which they are engaged.

- We may disclose nonpublic information concerning you to government agencies and regulatory organizations where we believe in good faith that the disclosure is required or permitted by law.

Protection of the Information That We Collect

First Ascent values your trust and realizes that an important element in maintaining that trust is our ability to safeguard your personal information from unauthorized disclosure, even after your relationship with us ends. Below we describe how we protect the confidentiality and security of your information.

- *Restricted Access and Employee Training.* Authorization to access your personal information is given only to those of our employees and agents who need to know such material in order to provide you with First Ascent's products and services and those persons authorized by you to receive such information. Recipients of your information are required to safeguard your information and hold it in the strictest of confidence. Privacy policies and procedures are an integral part of our employee training program.
- *Operational Safeguards.* We implement and maintain physical, electronic and internal procedural safeguards to protect your information.

This Privacy Policy replaces all previous notices and statements and applies only to First Ascent Asset Management. This Privacy Policy does not apply to other financial service providers. Review the privacy policies of those companies to understand how they collect, use and disclose NPI.

As required by federal law, we will notify you of our Privacy Policy annually. We reserve the right to modify this policy at any time and will promptly alert you if we make any material changes. For questions or to obtain additional information concerning First Ascent's Privacy Policy, please call 720.465.7888 and ask for your Client Services Representative.