

Sardis Group, LLC

Privacy Notice

Sardis Group, LLC ("Sardis", "we", "our", or "us") adopted this policy with recognition that protecting the privacy and security of the personal data and nonpublic personal information we obtain about our clients is an important responsibility. We collect your data in order to provide you with our services, but also to improve the service we provide. This Privacy Notice explains the kinds of personal data Sardis collects and processes, our reasons and purposes for collecting the data, how that data will be processed and by whom, and your rights with regard to your personal data.

WHAT INFORMATION WE COLLECT AND HOW WE COLLECT IT

We collect certain nonpublic personal information about you that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). Nonpublic personal information includes nonpublic "personally identifiable financial information" plus any list, description or grouping of customers that is derived from nonpublic personally identifiable financial information. Such information may include:

- Name, address, telephone number and e-mail address
- Social Security or Tax ID number and date of birth
- Information relating to services performed for or transactions entered into on behalf of clients (including information about brokerage accounts and transactions, such as purchases, sales, account balances, inquiries, etc.).
- Data or analyses derived from such nonpublic personal information

We also collect your personal data any time you visit our website, request that we contact you, sign up for our content, or provide personal information to us in order to receive our services. We collect data we receive automatically from your web browser or mobile devices, which may include the name of the website from which you entered our website, if any, as well as the name of the website you visit when you leave our site. This information may include the internet protocol ("IP") address of your computer or proxy server that you use to access the internet, your internet provider name, your web browser type, the make and model of your computer or mobile device, and your operating system. We may monitor your activity on our website for any lawful purpose; however, you may visit our website anonymously. Our website uses "cookies" to identify the areas of our website that you have visited. A cookie is a small piece of data stored on your computer or mobile device by your web browser that allows us to recognize your browser and collect and remember information. We use cookies to personalize the content that you see on our website and to compile aggregate data about site traffic and site interaction so that we can improve our website and provide you with a better online experience.

PLEASE NOTE: BY ACCESSING OUR WEBSITE, SUBSCRIBING TO OUR CONTENT AND/OR REQUESTING THAT WE CONTACT YOU, YOU ARE CONSENTING TO OUR COLLECTION AND PROCESSING OF YOUR PERSONAL DATA. IF YOU DO NOT CONSENT TO THESE TERMS, SIMPLY DO NOT VISIT OUR WEBSITE, SUBSCRIBE TO OUR CONTENT, OR REQUEST THAT WE CONTACT YOU.

WHAT INFORMATION WE DISCLOSE

Your personal data, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever without your consent except as stated below or unless sharing your personal data is necessary to deliver a product or service you have requested from us. We reserve the right to collect and use any non-personal data made available to us by your use of our website. We further reserve the right to aggregate such data for our internal analytics, which help us improve our website and service, and we may share – or sell – our data aggregations with and to others. At no time is your personally identifiable data included in such data aggregations.

Sardis does not disclose the nonpublic personal information we collect about our clients to anyone except: (1) in furtherance of our business relationship with clients, and then only to those persons necessary to effect the transactions and provide the services that clients authorize (such as broker-dealers, custodians, independent managers etc.); (2) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (3) our attorneys, accountants, and auditors; or (4) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative services on our behalf). These third parties are prohibited to use or share the information for any other purpose. If you decide to either terminate our services or become an inactive client, we will continue to adhere to our Privacy Policy, as may be amended from time to time.

SECURITY OF YOUR INFORMATION

We restrict access to your nonpublic personal information to those persons who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

CHANGES TO OUR PRIVACY POLICY

Our policy about obtaining and disclosing information may change from time to time. If, at any time, Sardis adopts material changes to its privacy policies, we shall provide each client with a revised notice reflecting the changes.

OPTING OUT

Clients cannot opt out of allowing Sardis to share certain of their nonpublic personal information with non-affiliated third parties which are necessary to service their accounts. You may limit us or our affiliates from marketing products or services to you based on the information that we collect and share with such affiliates. To limit marketing offers or our use of your personal data, contact us by sending an email to info@sardisgroup.com and we will work to implement your requested limitations.

REQUESTS FOR INFORMATION

If you have any questions concerning this Privacy Notice, please contact us at info@sardisgroup.com.