

FACTS**WHAT DOES Naples Asset Management Company, LLC ("NAMCOA") DO WITH YOUR PERSONAL INFORMATION?****Why?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect, and share depend on the product or service you have with us.

This information may include:

Social Security Number, Risk Tolerance Profile, Assets, Income, Account Balances, Account Transactions, Financial Objectives and/or Goals and other miscellaneous Personal Information

How?

All financial companies need to share customer personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer personal information; the reasons NAMCOA chooses to share; and whether you can limit this sharing.

Reasons we can share personal information	Do we share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	Yes
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	Yes
For our affiliates' everyday business purposes - information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share

To limit Sharing

Call us at 239.593.5525 or email us at pmcintyre@namcoa.com

Please note:

If you are a *new* customer, we can begin sharing your information 30 from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

Questions?

Please call 239.593.5525 or email us at pmcintyre@namcoa.com

Who we are

Who is providing this notice?

Naples Asset Management Company, LLC ("NAMCOA")

What we do

How does NAMCOA protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does NAMCOA collect my personal information?

We collect your personal information, for example, when you

- seek advice
- enter into an agreement
- see management of portfolio assets
- provide identification
- provide account information

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

What happens when I limit sharing for an account I hold jointly with someone else?

Your choices will apply to everyone who is part of your account

Definitions

Affiliates

These are Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *NAMCO Investor Services, LLC*

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies, such as account custodians:

- Fidelity
- SEI
- Interactive Brokers
- FOLIO

Joint marketing

This is a formal agreement between nonaffiliated financial companies that together market financial products or services to you. A joint marketing partners may include accounting firms, trust companies, insurance agencies and their agents. NAMCOA does not participate in Joint Marketing programs.

Other important information

Our home office corporate address is: NAMCOA – Naples Asset Management Company, LLC, 1100 Fifth Avenue South, Suite 201, Naples Florida 34102. Our website address is www.namcoa.com

Should you have any questions, call 239.593.5525 or email pmcintyre@namcoa.com