



**NEWGATE**

CAPITAL MANAGEMENT LLC

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## **PRIVACY POLICY NOTICE TO CLIENTS ABOUT FINANCIAL INFORMATION**

### **A. Your Privacy Is Important to Us**

Newgate Capital Management LLC is committed to maintaining the confidentiality, integrity and security of your personal information. We trust that our Privacy Policy will assure you of our commitment to keep your personal information confidential and secure.

### **B. Information We Have About You**

We collect nonpublic personal information about you from the following sources:

- you, from our Investment Advisory Agreement and other forms
- your financial consultant and
- your broker-dealer or custodian about your transactions with us or with others

### **C. Use and Protection of Information**

We use the information acquired solely for the purpose of providing investment advisory services to you. We take reasonable steps to keep confidential the information acquired. We restrict access to nonpublic personal information about you to those employees with a legitimate business need for the information. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

### **D. Disclosure of Nonpublic Personal Information**

Newgate does not disclose any nonpublic personal information about its clients or former clients to anyone, except for servicing and processing transactions, and as permitted by law.

### **E. Privacy Policy Updates**

As required by federal law, we will notify you of our privacy policy annually, as long as you maintain an ongoing relationship with us. The policy may change from time to time.