

Your Privacy Is Important

Madrone Hill Capital, LLC (“MHC”, “firm”, “we”, or “our”), as a Registered Investment Adviser, is covered under the definition of a “financial institution” under the Gramm-Leach-Bliley Act and the Securities and Exchange Commission’s (“SEC”) Privacy of Consumer Financial Information Rule (“Regulation S-P”).

The staff of Madrone Hill Capital, LLC realises that providing personal information is an act of trust. Madrone Hill Capital, LLC values its clients’ trust and confidence. We will never sell or share the nonpublic personal information obtained from or in reference to clients.

All information provided by clients to Madrone Hill Capital, LLC and its staff, and information and advice furnished to clients by us, shall be treated as confidential and shall not be disclosed to affiliated or unaffiliated third parties, except as permitted or directed by clients with written authorisation, by application to facilitate the investment services offered by the firm via an unaffiliated financial services provider, or as required by any rule, regulation or law.

Commitment to Your Private Information. Madrone Hill Capital, LLC is committed to safeguarding the confidential information of its clients. Madrone Hill Capital, LLC holds all personal information provided by clients in the strictest confidence and it is the objective of the firm to protect the privacy of all clients.

Except as permitted or required by law, Madrone Hill Capital, LLC does not share confidential information about clients with non-affiliated parties. It is our policy to restrict access to all current and former clients’ information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/non-affiliated entities who need to know that information in order to provide products or services in furtherance of the client’s engagement of Madrone Hill Capital, LLC.

Madrone Hill Capital, LLC permits only authorised employees and affiliates who have acknowledged receipt and understanding of our Privacy Policy (by acknowledging and accepting our firm’s Compliance Policies and Procedures) to have access to client information.

Employees violating Madrone Hill Capital, LLC Privacy Policy will be subject to our disciplinary process. If there are any changes to this policy, we will provide clients with written notice and clients will be provided an opportunity to direct Madrone Hill Capital, LLC as to whether such changes are permissible.

Why We Collect and How We Use Information. To conduct regular business, Madrone Hill Capital, LLC may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to the firm

- Information about the client's transactions implemented by the firm or others
- Information developed as part of financial plans, analyses, or investment advisory services

To provide financial planning services for clients, it is necessary for Madrone Hill Capital, LLC to provide access to client information within the firm and to non-affiliated companies, with whom we have entered into agreements.

The disclosure of information contained in any document completed by the client for processing and/or transmittal by Madrone Hill Capital, LLC to facilitate the commencement, continuation, and/or termination of a business relationship between the client and/or between Madrone Hill Capital, LLC and a non-affiliated third-party service provider (i.e., record keeper, insurance company, etc.), including, but not limited to, information contained in any document completed and/or executed by the client in furtherance of the client's engagement of Madrone Hill Capital, LLC (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding non-affiliated third-party service provider.

Sharing Information with Other Companies Permitted Under Law. Madrone Hill Capital, LLC may disclose the client's information: (1) to individuals and/or entities not affiliated with Madrone Hill Capital, LLC, including, but not limited to the client's other professional advisors and/or certain service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, record keeper, proxy management service provider, etc.) that may be recommended or engaged by Madrone Hill Capital, LLC in furtherance of the client's engagement of Madrone Hill Capital, LLC; (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations.

Since Madrone Hill Capital, LLC shares nonpublic information solely to service client accounts, the firm does not disclose any nonpublic personal information about the firm's customers or former customers to anyone, except as permitted by law.

In the event that the firm has a change to its client privacy policy that would allow it to disclose non-public information not covered under applicable law, the firm will allow its clients the opportunity to opt out of such disclosure. Finally, Madrone Hill Capital, LLC strives to only recommend financial services providers that share its privacy policies; however, clients are encouraged to request each specific firm's written policy for review.

Information Security. Madrone Hill Capital, LLC maintains physical, electronic, and procedural safeguards that comply with federal and state standards to protect its clients' nonpublic personal information. Through this policy and its underlying procedures, Madrone Hill Capital, LLC attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

Madrone Hill Capital, LLC maintains client records in a controlled environment and records are only available to authorized persons of the firm who have a need to access client information in order to deliver advisory services or respond to client requests. The Madrone Hill Capital, LLC policy to protect client information extends beyond the termination of the Engagement Letter or Client Agreement.

Children. Our company website is not directed to children under the age of 18 years. By accessing and using our website, you represent and warrant that you are at least 18 years old.

Former Clients. Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic information with strict confidentiality.

Changes to this Policy. Madrone Hill Capital, LLC will provide each client with initial notice of the firm's current privacy policy when the client relationship is established. We will also provide each client with a new notice of the firm's current privacy policy at least annually. If, at any time, Madrone Hill Capital, LLC adopts material changes to its privacy practices, the firm shall provide each client with a revised notice reflecting the new privacy practices.