



RETURN ON TRUST

CLARK DODGE ASSET MANAGEMENT, LLC PRIVACY POLICY

Our Commitment to Your Privacy: Clark Dodge Asset Management, LLC (“CDAM”), has a policy of protecting the confidentiality and security of information we collect about customers for which we provide services. We will not share nonpublic personal information about you (“Information”) with third parties outside of your custodian without your consent, except for the specific purposes described below. We are committed to keeping nonpublic personal information about you secure and confidential. This notice is intended to help you understand how we fulfill this commitment

Why We Collect and How We Gather Information: We collect and use Information to deliver service to you. From time to time, we may collect a variety of personal information about you, including:

- Information we receive from you on applications and forms, via the telephone, and through our websites;
- Information about your transactions with us, or others (such as your purchases, sales, or account balances); and
- Information we receive from consumer reporting agencies.

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify and record information that identifies each person who opens an account. When you open an account, we will ask for your name, address, date of birth (if applicable), social security number, email address, and employment or other personal characteristics and other information that will allow us to identify you. We may also ask you for identifying documents.

We may also collect digital Information about what you have viewed on and/or downloaded from our website.

How We Protect Information: Our employees are required to protect the confidentiality of Information and to comply with our established policies. They are authorized to access Information only when there is an appropriate reason to do so, such as to administer our products or services. Employees who violate our Privacy Policy are subject to disciplinary process. In addition, we maintain physical, electronic and procedural safeguards to protect Information, which comply with all applicable laws.

Disclosure of Information: We may disclose any kind of Information to or as directed by your custodian or when we believe it necessary for the conduct of our business, or where disclosure is required or permitted by law. For example, Information may be disclosed for audit or research purposes, to attorneys or other professionals, or to law enforcement and regulatory agencies to help, among other things, prevent fraud or money laundering. In addition, we may disclose any kind of Information to third party service providers (i) to enable them to provide business services for us or your custodian, such as performing computer related or data maintenance or processing services for us or your custodian, (ii) to facilitate the processing of transactions requested by you, (iii) to assist us in offering products and services or to assist your custodian in offering products and services to you, or (iv) for credit review and reporting purposes. Except in those specific, limited situations, without your consent, we will not make any disclosures of Information to other companies who may want to sell their products or services to you. For example, we do not sell customer lists, and we will not sell your name to a catalog company or telemarketer.

Former Customers: If your account with us terminates, we will continue to adhere to our privacy policies and practices with respect to your nonpublic personal information.

To Whom This Policy Applies: This Privacy Policy applies to individuals to whom products or services are provided by CDAM from our office in the United States, provided such products or services are used primarily for personal, family, or household purposes (not business purposes), whether or not the individuals have a customer relationship with us.

Further Information: We reserve the right to change this Privacy Policy. If there are material changes to this an updated policy will be sent to you. The examples contained within this Privacy Policy are for illustration purposes and they are not intended to be used as policy.

Clark Dodge Asset Management, L.L.C. is a registered investment adviser with the Securities and Exchange Commission. Please contact the Compliance Officer at 914-694-2390 or at info@clarkdodgewealth.com to request a copy of our Firm's Brochure, Form ADV Part II.