



Privacy Statement

eBIS, Inc., an independent investment management firm, is committed to safeguarding confidential information. We have developed policies in order to protect the personal information of all of our clients.

The categories of non-public information that we collect from you about your personal finances may include: 1) information we receive from you on applications or other forms, 2) verbal or written communications, and 3) information about transactions enacted on your behalf at your investment custodian. We use this information to assist you in meeting your personal financial goals.

In order to implement strategies and transactions, we may be required to provide this information to non-affiliated third parties. Only the information required to implement the strategy or transaction is provided. Non-affiliated third parties often include discount broker/dealers, tax professionals, attorneys, bankers, and other investment related businesses with which you do business. If necessary, we may disclose non-public personal information, such as name and brokerage account number, to a third party service provider, such as in connection with the filing of class action securities claims on your behalf. Participation in such services is strictly voluntary and you may opt out at any time.

Internally, we limit access to your personal information to those employees who need to know in order to conduct our business, service your account, and assist you in accomplishing your investment objectives. In addition, each employee is required to comply with the eBIS, Inc.'s Code of Ethics, Privacy Practices and Procedures, and Online Public Forums Policy, which reiterate the confidentiality of all our clients' information. In complying with applicable laws and regulations, we maintain physical, electronic, and procedural safeguards to protect your personal information.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. Electronic information is subject to all reasonable access control and intrusion prevention technologies, such as storage on cloud-based servers so that theft or loss of company computers does not place your confidential information at risk. Physical access to electronic and paper records is secured with locks. We do not provide your personal information to mailing list vendors or solicitors.

Personal identifiable information about you will be maintained during the time you are a client, and thereafter, as required by federal and state securities law, and consistent with the CFA Standards of Practice and the CFP Board's *Standards of Professional Conduct*. As permitted by law, federal and state securities regulators, as well as consultants and attorneys to assist in meeting our regulatory obligations, may review eBIS, Inc.'s records and your personal records. After the required period of record retention, all information is destroyed.

We will notify you annually of our privacy policy outlined in this Statement. We reserve the right to modify this policy at any time. You will be notified immediately of any material changes.