

Privacy Notice

We are committed to protecting the confidentiality and security of information we collect about clients. This commitment applies to current, prospective and former clients. In this notice, we refer to non-public information that identifies clients or their accounts as “personal information”. The purpose of this notice is to describe our policy concerning the confidentiality and security of client personal information.

We have not and will not sell client personal information to anyone. Our relationship with our clients is the most important asset of the firm. We strive to maintain the trust and confidence of clients, an essential aspect of which is a commitment to protect personal information. We will not disclose personal information to anyone outside the firm and its affiliates unless disclosure is (1) required or permitted by law (for example, to cooperate with regulators or comply with a valid subpoena), (2) at the direction of the client or authorized client representative, or (3) reasonably necessary to provide investment services or furnish clients with the information necessary to value the services of Geneva.

We collect and maintain personal information about clients and client accounts in order to provide our services. We collect client information from various sources, including:

- ◆ *Account Information.* Information received from clients to open an account or provide investment advice (such as name, social security number, address, telephone number and financial information such as assets, income, account balance(s), investment activity and other investments);
- ◆ *Transaction Information.* We generate personal information about clients while servicing their accounts (such as trade tickets and account statements, account balances, and security positions); and
- ◆ *Third Party Information.* We receive personal information about clients or their accounts from certain third parties (such as trade confirmations from brokerage firms and account activity and holdings information from custodians).

In order for us to provide investment management services to our clients, it is necessary to disclose personal information in limited circumstances, subject to strict confidentiality agreements where applicable, which include:

- ◆ Disclosures to non-affiliated third parties that help process or service client transactions or accounts (such as providing account information to auditors who verify performance numbers, service providers who record and process account activity, broker-dealers and custodians); and
- ◆ Disclosures at a client’s request to attorneys, accountants, and other individuals or firms to assist them in providing services to clients.

To fulfil our privacy commitment, we have instituted policies and procedures reasonably designed to safeguard the personal information of our clients. These include:

- ◆ Adopting policies and procedures that put in place physical, electronic, and other safeguards to keep client information safe while in our possession and upon destruction;
- ◆ Limiting employee access to personal information for business purposes only. All employees are trained and required to safeguard such information;
- ◆ Requiring third parties who perform services for us to contractually agree to keep personal information about clients strictly confidential; and
- ◆ Protecting information of former clients to the same extent as current clients.

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