



Privacy Notice

Confluence Investment Management LLC is committed to protecting your personal information to ensure your financial privacy. Because safeguarding your personal information is important to us, we will not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law and described below.

Information We Collect

We collect the following types of nonpublic personal information about you:

- Information you supply on applications or other forms, such as your name, date of birth, address, social security number, assets, investment objective, account balance, email address, account number, telephone numbers, income, and similar information. We use this information in providing our investment advisory services to you.
- Information about your transactions with us or others, such as your account balance and account transactions. We use this information to evaluate your financial situation and provide better services to you.
- Information from visits to our website such as site visitorship data and online data collection devices such as "cookies." Confluence uses this information to track traffic on our website.

Disclosure of Information

As permitted by law, we may disclose some or all of the information we collect, as described under "Information We Collect," to unaffiliated third parties to service your account and to provide services you request. Such unaffiliated third parties include:

- Companies that provide financial services, such as broker-dealers, banks, custodians, mutual fund companies, and insurance companies.
- Non-financial companies, such as companies that assist us in marketing our services.
- Others who provide services to us, such as parties who provide technical support for our hardware and software system (e.g., contact relationship management systems), marketing services, and our legal and accounting professionals, as well as government agencies and other parties as permitted or required by applicable law.

The information we share with parties that provide us with marketing and other services is limited to information they need to perform their services and we require such parties to agree to use the information only for the purpose of performing their services. If you would like to request, delete, limit the sharing, or update the personal information that you provided to us, you may reach us using the contact information below.

Protection of Your Information

We restrict access to nonpublic personal information about you to those employees who need to know that information in order to provide our services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your personal information. We do not sell personal information to parties not affiliated with us for the purpose of marketing their services or products to you or for any other purpose, and we do not share your personal information with other parties except in the limited circumstance discussed above.

Continued Protection of the Privacy of Former Clients

Even if you are no longer our client, our privacy notice still applies to you.

Updates and Inquiries

We reserve the right to update this notice at any time to reflect changes concerning the collection and use of personal information. This revised notice will be effective immediately upon posting to our website. For questions about our notice, please contact us at compliance@confluenceim.com or 314-743-5090.

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