

**Confluence Investment Management LLC**  
**Privacy Notice**

**Privacy Policy**

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, address, social security number, assets, 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.

**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, 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 systems 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.

**Protection of Your Information**

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide our services to you. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your nonpublic 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 circumstances discussed above.

**Continued Protection of the Privacy of Former Clients**

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

**Updates and Inquiries**

As required by federal law, we will notify you of our privacy policy annually. We reserve the right to modify this policy at any time; however, if we do change it, we will notify you promptly. For questions about our policy, please contact us at [compliance@confluenceim.com](mailto:compliance@confluenceim.com) or 314-743-5090.

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