

PRIVACY POLICY

This notice describes the privacy policy of Martino Capital, LLC, a Registered Investment Adviser. We are required, by federal law, to provide you with this notice, which outlines our business practices to protect your privacy as well as how we collect and share personal information about you. This policy applies to both current and former clients.

We Respect Your Privacy

Martino Capital, LLC (“Martino”) is committed to protecting your privacy. MARTINO relies on access to your personal financial information in order to provide you with relevant information regarding the products and services we offer as well as provide you with appropriate investment recommendations. We appreciate and understand that the personal financial information you have entrusted to us is sensitive and confidential and we have adopted policies and procedures which assist us in safeguarding the information you provide to us.

Personal information we collect about you

MARTINO collects confidential client information from you in a number of ways including information provided on our new account applications and other forms we receive from you, consumer reporting agencies, information obtained through our website, as well as information obtained from other sources.

For example:

- We collect information such as your name, address, telephone number, email address, social security number, date of birth, net worth, income, financial objectives and investment experience through applications and other forms you submit to us
- We may access information regarding your account balances, your use of account(s), and the types of products and services you prefer through your interactions and transactions with us
- We may obtain information about your creditworthiness and credit history from credit reporting agencies
- We may collect background information from and through third-party vendors to verify representations you have made and to comply with various regulatory requirements

How we share your personal information

MARTINO is registered as an investment adviser with the Colorado Division of Securities.

MARTINO does not share confidential information about our clients with unaffiliated third parties unless such disclosure is necessary to manage and service your account. For example, we provide access to information about you to unaffiliated third parties in certain limited circumstances, including:

- to help us process transactions for your account(s)
- to help us manage and service your account(s)
- when we contract with third parties to provide account related services such as printing, mailing, and data processing services
- when we believe that disclosure is required or permitted under law. For example, we may be required to disclose your personal information to cooperate with regulatory or law enforcement authorities, to report tax-related information to federal and state governments, to resolve consumer disputes, to perform credit/authentication checks, or for risk control.

MARTINO recognizes that your relationship with your Financial Professional is important. If your Financial Professional ends his/her affiliation with us, and (s)he joins another firm with which we have entered into an agreement limiting the use of information, we will permit your Financial Advisor to retain certain contact information limited to your name, address, telephone number, email address and account title.

How we protect your confidential personal information about you

We have internal policies and procedures which govern the handling of client information by employees. Third parties which provide account service and support on our behalf may also receive personal information about you, and we require them to adhere to appropriate security standards with respect to such information. Under no circumstances will MARTINO sell confidential client information to anyone, for any reason, at any time.

Contact Us with Questions

If you have any questions or concerns, or if you identify any information that you believe is no longer accurate, you may contact your MARTINO Investment Advisor Representative or write to MARTINO, Attn: Compliance Department, 9113 E Vassar Avenue, Denver, CO 80231.

SIPC Notice

Accounts that are carried by Charles Schwab and Company, Inc., (Schwab) member of NYSE/FINRA/SIPC, are covered by the Securities Investor Protection Corporation (“SIPC”). SIPC coverage is not the same as FDIC insurance. In the event of a Martino’s failure, SIPC protects its members’ securities customers up to \$500,000 (including \$100,000 for claims for cash). You may obtain an explanatory brochure by contacting SIPC at (202) 371-8300, visiting SIPC’s website at www.sipc.org or by asking your Investment Advisor Representative. Each customer account carried by Schwab also receives excess SIPC protection. Neither SIPC coverage nor excess SIPC coverage applies to market losses.

Thank you for your business and allowing us to service your needs.