

OPTION RESEARCH & TECHNOLOGY SERVICES, LLC (“ORATS”)

WHAT DOES ORATS DO WITH YOUR PERSONAL INFORMATION?

Financial companies choose how they share your personal information. Federal law gives our clients the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

ORATS is committed to safeguarding the use of your personal information. As your investment adviser, we protect the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the advisory services we provide you through our operational interactive website (the “Website”). We do not disclose nonpublic personal information about our clients or former clients to third parties other than as described below.

Personal information we collect. We collect personal information about you in connection with our providing advisory services to you. This information includes your social security number and may include other information such as your:

- Assets, liabilities and net worth;
- Employment information;
- Insurance and estate planning information;
- Investment experience;
- Investment objectives and risk profile;
- Trusted person contact information;
- Transaction history;
- Income, tax, expense and cash flow information; and
- Wire transfer instructions.

How we collect this information. We collect this information from you through various means, such as when you give us your contact information or enter into a services agreement with us through the Website. We also may collect your personal information from other sources as applicable.

How we use this information. All financial companies need to share customers’ personal information to run their everyday business and we use the personal information we collect from you for our everyday business purposes. These purposes may include for example:

- To provide advisory services to you through the Website.
- To market products and services to you.
- To respond to court orders and legal investigations.

Disclosure to others. We may provide your personal information to our affiliates and to firms that assist us in providing services through the Website and have a need for such information. We may also disclose such information to service providers and financial institutions with whom we have joint business arrangements for proper business purposes in connection with providing services to you through the Website. We require third-party service providers and financial institutions with which we have joint business arrangements to protect the confidentiality of your information and to use the information only for the purposes for which we disclose the information to them. In addition, your nonpublic personal information may also be disclosed to you, persons we believe to be your authorized agent, trusted contact

person, or representative, and regulators to satisfy ORATS's regulatory obligations and as otherwise required or permitted by law.

These sharing practices are consistent with Federal privacy and related laws, and in general, you may not limit our use of your personal information for these purposes under such laws. We note that the Federal privacy laws only give you the right to limit the certain types of information sharing that we do not engage in (e.g., sharing any personal information with nonaffiliates for them to market to you).

UNDER NO CIRCUMSTANCES WHATSOEVER WILL ORATS SELL INFORMATION ABOUT YOU OR YOUR BUSINESS TO ANYONE PUBLIC OR PRIVATE.

How we protect your personal information. To protect your personal information from unauthorized access and use, we use security measures that comply with Federal law. We restrict access to your nonpublic personal information to those who have a legitimate need to know and only allow disclosures to persons and companies as permitted by law to assist in providing products and/or professional services to you through the Website. We maintain physical, electronic, and procedural safeguards, including encryption, authentication, and secure data storage practices, in accordance with federal law and regulatory standards to protect your nonpublic personal information.

Our employees are advised about the firm's need to respect the confidentiality of our clients' nonpublic personal information. Any employee who has access to individual information receives training about and is required to follow company procedures designed specifically to keep that information confidential. These procedures are also designed to ensure that your financial information is accurate, current, and complete. Please notify us if at any time our records contain incomplete or inaccurate information about you. Upon notification from you regarding our records, we will promptly address your concerns and make any necessary corrections.

Whom to contact with questions. If you have any questions about this privacy notice, contact Matthew Amberson at (312) 986-1060 or go to <https://orats.com/>.

Protecting your privacy is an ongoing process. As technology continues to advance, ORATS will continue to evaluate its security standards and procedures associated with protecting your privacy. Nothing is more important to us than our clients' trust and confidence, and we will take whatever steps necessary to maintain the security of our professional relationships. Our policies and procedures for the disclosure of information stated above apply to both current and former clients of ORATS. Going forward, we will send you notice of our privacy notice annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy notice and will provide you with a revised notice if the changes materially alter the previous privacy notice. We will not, however, revise our privacy notice to permit the sharing of nonpublic personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent information sharing.