

# Privacy Policy

April 2025

## **Re: Gaard Capital LLC Privacy Policy**

Dear Client,

Gaard Capital LLC (“Gaard”) is committed to safeguarding and protecting the confidential information and privacy of our clients. We do not share or disclose any non-public personal information about our clients or former clients to non-affiliated third parties, except as permitted by law, as further described below.

The Gramm-Leach-Bliley Act (“GLBA”) and the adoption of Regulation S-P by the Securities and Exchange Commission (“SEC”) require that investment advisers establish policies and procedures to ensure proper management of client information in a private and secure manner.

This letter provides notice to you about our privacy policies and practices.

## **Client Privacy Statement**

The following statement explains how Gaard handles the information that we receive about our clients. Gaard is committed to protecting the privacy and confidentiality of non-public personal client information. Personal information is any data that identifies clients or their accounts.

### Information Collection

Gaard may collect personal information through submission of account documentation and contact information on forms completed by the client, or the client’s authorized representative, that include the client’s name, e-mail and postal addresses, and phone number, as well as information related to account setup, such as Social Security number and account numbers, and subsequent contribution and transaction activity.

### Information Use Only

It is Gaard's policy not to disclose non-public information about our clients among any affiliated companies, unless there is a legitimate business need, or to any other parties except where required by law or authorized by the client, the client's authorized representative, or as outlined in this Privacy Policy.

From time to time, Gaard may disclose personal information collected from clients to third-party service providers that support the operation of certain areas of our investment advisory business. Gaard may also use such information during the account intake process, including for purposes such as conducting anti-money laundering screening. We require any third-party service providers to protect the confidentiality of your information and to use it only for the purposes for which it was disclosed.

### Safeguards

Gaard uses the following measures to protect the privacy of clients. All personal information in our systems is protected from unauthorized access by a secure firewall, network server, and database architecture. Access to this information by personnel within Gaard is restricted to individuals with legitimate business reasons. In instances where personal information is exchanged via the internet, both electronic and procedural safeguards are used, including the encryption of all sensitive data.

It is the policy of the Firm to ensure that so-called "consumer report information" (such as personal information about a client, e.g., Social Security number) is protected, maintained, and disposed of in ways that safeguard such information from unauthorized use or disclosure. Gaard will take reasonable measures to dispose of personal information so that it cannot be read or reconstructed for unauthorized use. Gaard will determine the appropriate method of disposal on an as-needed basis.

### Service Providers and Joint Marketing Agreement

Gaard may have relationships with non-affiliated third parties that require us to share client information in order for the third party to carry out services on our behalf.

### Processing and Servicing Transactions

Gaard may share information when it is necessary to effect, administer, or enforce a transaction for our clients, or if a client initiates a request for us to share information with an outside party. All requests by clients must be received in writing from the client.

### Sharing as Permitted or Required by Law

Gaard may disclose information to non-affiliated third parties as allowed by law. For example, this may include disclosure in connection with a subpoena or similar legal process, a fraud investigation, the recording of deeds of trust and mortgages in public records, an audit or examination, or the sale of an account to another financial institution. Where permitted by law, Gaard will only do so after providing notice to the client.

### Privacy Notice Delivery

The Fixing America's Surface Transportation Act (the "FAST Act"), enacted in December 2015, updated the Privacy Policy notice requirements for investment advisers and clarified advisers' obligations under the Privacy Rules. Under the FAST Act, investment advisers are not required to send annual Privacy Notices to "consumers" if the adviser (i) only shares non-public personal information with non-affiliated third parties in a manner that does not require providing an opt-out right to clients; and (ii) has not changed its policies and procedures regarding the disclosure of non-public personal information since the last Privacy Notice was provided.

All new clients shall receive an initial privacy notice prior to entering into an investment advisory agreement, and as best practice, will also receive an annual privacy notice.

Should you have any questions, please contact [jonathan@gaard.capital](mailto:jonathan@gaard.capital) or reach us by phone at (805) 265-0221.