

## Privacy Policy

The privacy policy statement is given to clients at the initial signing of the client agreement and delivered with client consent once annually, if the policy is updated. The firm will document the date the privacy policy was delivered to each client for each year if an annual delivery is required. Csenge collects non-public personal information about clients from the following sources:

- Information it receives from them on applications or other forms;
- Information about their transactions with Csenge or others; and
- Information it receives from a consumer reporting agency.

Below are the reasons for which Csenge may share a client's personal information.

- For everyday business purposes – such as to process client transactions, maintain client account(s), respond to court orders and legal investigations, or report to credit bureaus;
- For marketing by Csenge – to offer Csenge's products and services to clients;
- For joint marketing with other financial companies;
- For affiliates' everyday business purposes – information about client transactions and experience; or
- For non-affiliates to market to clients (only where allowed).

If a client decides to close his or her account(s) or becomes an inactive customer, Csenge will adhere to the privacy policies and practices as described in this Policies and Procedures manual. Csenge restricts access to clients' personal and account information to those employees who maintain a business need in order to provide products or services to its clients. Csenge maintains physical, electronic, and procedural safeguards to protect clients' non-public personal information.

In addition to Csenge's listed access persons, any IT persons or other technical consultants employed by the firm may also have access to non-public client information at a given time. An on-site or off-site server that stores client information, third-party software that generates statements or performance reports, or third-party client portals designed to store client files all hold the potential for a breach of non-public client information.

To mitigate a possible breach of the private information, Csenge uses encryption software on all computers and carefully evaluates any third-party providers, employees, and consultants with regard to their security protocols, privacy policies, and/or security and privacy training.

The system is tested and monitored at least periodically.