



## PRIVACY NOTICE

### Categories of Personal Information We Collect

We have collected some or all of the following categories of personal information from individuals within the last twelve (12) months:

- Identifiers, such as name, contact details and address (including physical address, email address and Internet Protocol address), and other identification (including social security number, passport number and drivers' license or state identification card number);
- Other customer records, such as telephone number, signature, bank account number, other financial information (including accounts and transactions with other institutions and anti-money laundering information), and verification documentation and information regarding clients' status under various laws and regulations (including social security number, tax status, income and assets);
- Protected classification characteristics under state or federal law, such as date of birth, citizenship and birthplace;
- Commercial information, such as account data and other information contained in any document provided by clients to authorized service providers (whether directly or indirectly), risk tolerance, transaction history, investment experience and investment activity; and
- Internet or other electronic network activity information, such as information regarding your use of our website and client portal (e.g., cookies, browsing history and/or search history), as well as information you provide to us when you correspond with us in relation to inquiries.

Within the last twelve (12) months, we have shared each of the categories of personal information collected with affiliates and third-party service providers, and we collect personal information from the sources set forth above.

### Purposes for Collecting Personal Information

We may collect or share the personal information we collect about you for one or more of the following business or commercial purposes:

- performing services to you, including but not limited to:
  - the administrative processes (and related communication) in preparing for account opening and closing and the processing of transactions;
  - ongoing communication with you, your representatives, advisors and agents;
  - ongoing operations, administrative, accounting, reporting, account maintenance and other processes and communication required to invest, reinvest and otherwise monitor your assets;
  - keeping you informed about our business;
- auditing and verifications related to client interactions, including but not limited to, verifying the quality and effectiveness of services and compliance;

- detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity; and
- complying with U.S., state, local and non-U.S. laws, rules and regulations.

**WE DO NOT SELL ANY OF THE PERSONAL INFORMATION WE COLLECT ABOUT YOU TO THIRD PARTIES.**

**Deletion Rights**

You have the right to request that we delete any of your personal information that we retain, subject to certain exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations.

**Disclosure and Access Rights**

You have the right to request that we disclose to you certain information regarding our collection, use, disclosure and sale of personal information specific to you over the last twelve (12) months. Such information includes:

- The categories of personal information we collected about you;
- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting such personal information;
- Categories of third parties with whom we share the personal information;
- The specific pieces of personal information we have collected about you; and
- Whether we disclosed your personal information to a third party, and if so, the categories of personal information that each recipient obtained.

**No Discrimination**

We will not discriminate against you for exercising your rights, including by denying service, suggesting that you will receive, or charging, different rates for services or suggesting that you will receive, or providing, a different level or quality of service to you.

**How to Exercise Your Rights**

To exercise any of your rights under applicable privacy laws, or to access this notice in an alternative format, please submit a request via email: [frank@aventinefg.com](mailto:frank@aventinefg.com)

We will contact you to confirm receipt of your request and request any additional information necessary to verify your request. We verify requests by matching information provided in connection with your request to information contained in our records. Depending on the sensitivity of the request and the varying levels of risk in responding to such requests (for example, the risk of responding to fraudulent or malicious requests), we may request additional information in order to verify your request. You may designate an authorized agent to make a request on your behalf, provided that you provide a signed agreement verifying such authorized agent's authority to make requests on your behalf, and we may verify such authorized person's identity using the procedures above.

\*Some state laws give residents additional rights to limit sharing. Under these laws, we may not be able to share information of minors who are of a certain age. In some states, this age is 13 years old. In order to share this information, we must obtain first written permission ("opting-in"). If we do not receive permission to share personal information, then we are prohibited from sharing it or processing it for targeted advertising:

**I give you permission to share my personal information:**

**Signature of Client(s):** \_\_\_\_\_

**Printed Name:** \_\_\_\_\_

Our goal is to respond to any verifiable consumer request within forty-five (45) days of our receipt of such request. We will inform you in writing if we cannot meet that timeline. Please contact Frank Fiumecaldo, the Chief Compliance Officer, at [frank@aventinefg.com](mailto:frank@aventinefg.com) with any questions about this Privacy Notice.

## **PRIVACY NOTICE SUPPLEMENT: CALIFORNIA RESIDENTS**

California law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at (212) 269-2512. To obtain further information, contact The Office of the California Attorney General at P.O. Box 944255, Sacramento, CA 94244; phone (916) 210-6276.

## **PRIVACY NOTICE SUPPLEMENT: COLORADO RESIDENTS**

Colorado law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at (212) 269-2512. To obtain further information, contact The Office of the Attorney General, Colorado Department of Law at 1300 Broadway, 10<sup>th</sup> Floor, Denver, CO 80203; phone (720) 508-6000.

## **PRIVACY NOTICE SUPPLEMENT: CONNECTICUT RESIDENTS**

Connecticut law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at (212) 269-2512. To obtain further information, contact The Office of the Attorney General, 165 Capitol Avenue, Hartford, CT 06106; phone (860) 808-5318; email [Attorney.General@ct.gov](mailto:Attorney.General@ct.gov).

## **PRIVACY NOTICE SUPPLEMENT: FLORIDA RESIDENTS**

Florida law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at (212) 269-2512. To obtain further information, contact The Office of the Attorney General, PL-01 The Capitol, Tallahassee, FL 32399-1050; phone (866) 966-7226.

## **PRIVACY NOTICE SUPPLEMENT: MARYLAND RESIDENTS**

Maryland law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at (212) 269-2512. To obtain further information, contact The Office of the Attorney General, 200 St. Paul Place, Baltimore, MD 21202; phone 888-743-0023 ; email [consumer@oag.state.md.us](mailto:consumer@oag.state.md.us).

## **PRIVACY NOTICE SUPPLEMENT: NORTH CAROLINA RESIDENTS**

North Carolina law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at (212) 269-2512. To obtain further information, contact The Office of the Attorney General, 9001 Mail Service Center, Raleigh, NC 27699-9001; phone (919) 716-6400.

## **PRIVACY NOTICE SUPPLEMENT: NEW JERSEY RESIDENTS**

New Jersey law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at (212) 269-2512. To obtain further information, contact The Office of the Attorney General, 140 East Front Street, 6th Floor Trenton, NJ 08625-0090; phone (609) 292-4925.

## **PRIVACY NOTICE SUPPLEMENT: NEVADA RESIDENTS**

Nevada law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at (212) 269-2512. To obtain further information, contact The Bureau of Consumer Protection, Office of the Nevada Attorney General at 555 E. Washington Ave., Suite 3900, Las Vegas, NV 88101; phone (888) 434-9989; email [BCPINFO@aq.state.nv.us](mailto:BCPINFO@aq.state.nv.us).

## **PRIVACY NOTICE SUPPLEMENT: TEXAS RESIDENTS**

Texas law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at (212) 269-2512. To obtain further information, contact The Office of the Attorney General, P.O. Box 12548, Austin, TX 78711-2548; phone (512) 463-2100.

## **PRIVACY NOTICE SUPPLEMENT: VIRGINIA RESIDENTS**

Virginia law requires us to disclose that you may request to be placed on our “do not call” list at any time by calling us at (212) 269-2512. To obtain further information, contact The Office of the Attorney General, 202 North Ninth Street, Richmond, VA 23219; phone (804) 786-2071.