

PRIVACY NOTICE

The terms “Churchill Stateside Securities, LLC” (CSS”), as used herein, shall mean and include any and all subsidiaries, parent or sister corporations, limited liability companies, partnerships or other entities controlling, controlled by, or under common control with said company, including, but not limited to, Churchill Stateside Securities, LLC.

The Securities and Exchange Commission has adopted Regulation S-P, privacy rules promulgated under Section 504 of the Gramm-Leach-Bliley Act. These rules require financial institutions to provide customers with notice of their privacy policies and practices and place limitations on the disclosure of nonpublic personal information. This notice, in summary form, is intended to inform you how we collect, use, share, and protect your nonpublic personal information (“customer information”).

Source of Information

The information we collect about you primarily originates from:

- Documents and forms you provide in connection with our services
- Information generated and maintained in the course of transactions and engagements
- Records relating to your transactions and relationships with us

We may also receive information from third parties, such as financial institutions, service providers, or other sources, as necessary to provide our services.

Third-Party Sharing of Information

CSS does not sell client information. Customer information may be shared with nonaffiliated third parties under the following circumstances:

1. Processing to Facilitate Client Business

For example, transmission of account or transactional information to custodians, counterparties, or service providers supporting our operations.

These third parties are contractually required to use such information only for the specified purpose and to protect its confidentiality.

2. Service Providers

We may disclose information to third-party service providers (e.g., technology vendors, data room providers, or compliance consultants) that assist in delivering our services.

These providers are required to:

- Safeguard customer information
- Use it only for authorized purposes
- Promptly notify us of any security incident involving such information

3. As Required or Permitted by Law

Including responses to subpoenas, court orders, regulatory inquiries, or other legal processes.

4. As Authorized by the Client

When you direct us to provide information to a third party.

Confidentiality and Security

CSS considers its clients and all information received from clients to be confidential. We restrict access to customer information to employees and authorized agents who need such information to provide services.

We maintain administrative, technical, and physical safeguards designed to protect customer information in accordance with federal standards. These safeguards include:

- Access controls and system protections
- Secure handling and storage of information
- Employee training and confidentiality requirements

We also oversee third-party service providers to ensure they maintain appropriate safeguards for customer information.

Incident Response and Breach Notification

CSS maintains a written program designed to detect, respond to, and recover from unauthorized access to or use of customer information.

If sensitive customer information is accessed, or is reasonably likely to have been accessed, without authorization, we will:

- Investigate and take appropriate steps to contain the incident
- Provide notice to affected individuals as required by applicable law

Questions

Clients are encouraged to contact CSS with any questions regarding this Privacy Notice or our information handling practices.

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