



Strategic Frontier Management, LLC

Privacy Policy (Amended: May 15, 2018 to include GDPR Data Policy)

Introduction

Strategic Frontier Management, LLC ("SFM") consider customer privacy of non-public information to be fundamental to trusted advisory relationships with clients, and we are committed to maintaining confidentiality, integrity and security of personal information. As a registered investment adviser, SFM respects the privacy and the confidentiality of client information.

SFM must comply with SEC Regulation S-P, which requires registered advisers to adopt policies and procedures to protect "nonpublic personal information" of clients, as well as disclose such policies and procedures for protecting that information. Nonpublic personal information includes nonpublic "personally identifiable financial information", including any list, description, or grouping of clients that is derived from nonpublic personally identifiable financial information.

We may collect non-public personal information about you on RFPs, questionnaires, and other forms we receive from you, as well as from personal contacts such as correspondence, e-mail, telephone calls, or meetings. We may also receive information about you from third parties, such as accountants, lawyers, financial consultants, or other service providers. Such information may include financial holdings, account information, services performed, or transactions resulting from investment advisory services provided to clients. Client information may be used in order to identify potential client needs for additional investment management services.

SFM is obliged to maintain the privacy of their clients and their clients' information, as addressed in the 1999 Gramm-Leach-Bliley Act - Privacy Safeguards Rule (GLBA). Nearly all financial service firms are subject to these federal regulations. Federal privacy regulations require financial institutions to have a comprehensive privacy policy, send privacy notices to clients annually, and notify new clients of our privacy policy. Finally, we must maintain records of SFM's privacy policy and client communications, including complying with ADV, Part 2a (Brochure) disclosures of the firm's privacy policy and opt-out procedures.

Non-Disclosure of Client Information

SFM maintains safeguards to comply with federal and state regulatory requirements regarding nonpublic personal information of clients, and does not share non-public client information with unaffiliated third parties, except as necessary to perform the investment management services it has been hired to provide. For example, SFM may share non-public client information with brokers and custodian banks in order to manage client accounts or provide investment advice. SFM does not engage in joint marketing arrangements with unaffiliated third parties that involve the sharing of non-public client information, nor will such information be provided to unaffiliated third parties for their own marketing purposes.

SFM does not disclose your information except as required or permitted by law or required by regulatory authorities and law enforcement. In the event that Strategic Frontier Management is involved in a merger, acquisition, reorganization or sale of assets, or bankruptcy, your information may be transferred or sold as part of that transaction.

Employees are prohibited, either during or after termination of their employment, from disclosing nonpublic personal information to any person or entity outside SFM, except under the circumstances or purpose described above. An employee is permitted to disclose nonpublic personal information only to

other employees who need to have access to such information to execute or manage investment advisory services to the client.

Security of Client Information

SFM restricts access to nonpublic personal information to those representatives who need to know such information to provide advisory services to our clients. Authorized access to nonpublic personal information is required to keep such information secure. Technical, administrative, and procedural measures attempt to safeguard your personal and other information from unauthorized access or use, but no such measures are completely secure, so we cannot guarantee that your personal information will be secure from theft, loss, or unauthorized access or use, and we make no representation as to the reasonableness, efficacy, or appropriateness of the measures we use to safeguard such information. Users are responsible for maintaining the secrecy of their own passwords. If you have reason to believe that your interaction with us is no longer secure or has been compromised, please notify us as soon as possible. Conversations involving nonpublic personal information must be conducted in private, and care must be taken to avoid any unauthorized persons overhearing or intercepting such conversations.

Initial Privacy Notices

Strategic Frontier Management, LLC must provide initial privacy notices in two situations:

1) When a customer relationship is established, initial notice must be given no later than the time the Client signs the investment advisory Agreement. Initial notice may be given at the same time an investment adviser is required to give other notices, such as the required notice of credit terms in margin transactions, or the written disclosure statement (brochure) that an investment adviser must provide a client with no later than the time of entering into an advisory agreement with the client, requiring delivery of the brochure (i) not less than 48 hours before entering into an investment advisory contract with the client or (ii) at the time of entering into the contract as long as the client has at least 5 business days to cancel the contract without penalty.

There are several situations in which initial notice may be delayed even after a customer relationship is established. Those situations include instances where the consumer's transaction would otherwise be delayed and the consumer agrees to receive the notice at a later time as well as when a nonaffiliated investment adviser or broker-dealer purchases fund shares or establishes a brokerage account on behalf of a customer.

2) Even if no client relationship is established, initial notice must be given if Strategic Frontier Management, LLC obtains nonpublic personal information from a client or prospective client, and plans to disclose the information to a nonaffiliated third party. Information limited to name, contact information, and areas of investment interest is not sufficient to be considered a "consumer".

Annual Privacy Notices and Revision Notices

Privacy notices are provided to customers annually, usually within the first month following calendar year-end. We may revise our Privacy Notice from time to time, but the most current version will always be available by request using contact link on our website (www.StrategicCAPM.com/contact).

By continuing your Investment Advisory Agreement, you agree to acknowledge and be bound by revisions to our Privacy Policy. Even if a Client's Agreement is amended materially, you should not need to receive an additional privacy notice, as long as the most recent notice is accurate with respect to available investment advisory and consulting services. If there are significant changes to our policy, we will provide a revised notice to all clients and prospective clients.

Privacy Policy - GDPR Data Notice (Added May 15, 2018)

Strategic Frontier Management, LLC (SFM) is California registered investment advisor specializing in providing global strategic and tactical asset allocation advice to asset owners (including retirement plans, pension funds, family offices, and high net worth individuals), as well as their investment advisors.

We are communicating with you because we may retain contact information that you have provided or were collected from publicly available databases. It is important that you understand our privacy practices and policy, including your data privacy rights under the *General Data Protection Regulation* (GDPR), effective in May 2018. This regulation of European Union law seeks to increase privacy and protect data of individuals accessible electronically within the European Union (EU) and the European Economic Area, including export of personal data from this region. The GDPR aims increase control of EU residents and citizens over their personal data to ensure transparency, fairness and increased confidence in the security of individuals' data. This policy is consistent with our commitment to honoring your privacy in our relationships.

We are respectful of protecting your information, maintaining your privacy, and do not distribute or sell any information to any third party unless explicitly directed by you, nor do we track activity on our website. If you would prefer that we do not contact you, please send us a note at: www.strategiccipm.com/contact to remove your contact information from our distribution. You may also opt-in to receiving our periodic and currently free investment commentary (at least quarterly) using www.strategiccipm.com/contact.

A link to our Privacy Policy can be found at www.StrategicCAPM.com. Privacy Policy Changes will be posted there, as well. Please contact us if you have questions or concerns about this policy at: www.strategiccipm.com/contact.