

**OUR
BUSINESS
PRACTICE**

Since the founding of the firm, we have protected the privacy of client information as a fundamental business practice. The most valued asset at Parvin Asset Management is our relationship with you. We are honored by the confidence you have placed in us and will guard that trust with the policies and practices listed below.

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on advisory agreements or other forms; and
- Information related to transactions or other activities in your accounts.

We do not disclose any nonpublic personal information about you to anyone, unless directed by you or as required by law.

We restrict access to your personal information and your account information. Only those employees or third parties who need to know that information to provide advisory services to you, and are subject to confidentiality restrictions, are granted access. We maintain physical, electronic, and procedural safeguards to protect the privacy of any nonpublic information about you.

If you decide to close your account, we will continue to adhere to the practices described in this Privacy Policy.

Should you have questions or concerns regarding our commitment to protect your privacy, please contact us.

Office Address

Parvin Asset Management
401 E. 8th Street, Suite 213A
Sioux Falls, SD 57103

Mailing Address

Parvin Asset Management
P.O. Box 415
Pocomoke City, MD 21851

General Contact

Phone: 610-806-9001
Fax: 866-670-0972
Email: info@parvinam.com

Privacy Policy

FACTS

Parvin Asset Management ("Parvin" or "the Firm") may share your personal information but strictly limits any disclosure unless directed by you or as required by law. Please read this notice to learn about our policies regarding your personal information.

WHY

Financial companies choose how they share your personal information. Federal law gives clients the right to limit some, but not all, sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. The description that follows is intended for you to understand what we do.

WHAT

The types of personal information we collect and can share generally include, but may not be limited to:

- your social security number and income;
- your address and date of birth;
- your account balances and transactions; and
- your beneficiaries.

HOW

Investment firms need to share clients' personal information in order to run their everyday business. In the section below, we list the reasons financial companies can share personal information; the reasons Parvin may choose to share your information; and whether you can limit this sharing.

REASONS WE CAN SHARE YOUR PERSONAL INFORMATION	DOES PARVIN SHARE?	CAN YOU LIMIT THIS SHARING?
For our everyday business purposes To process your transactions, open and maintain your accounts, and respond to court orders	Yes	No
For our marketing purposes To offer our investment services to you	No	We don't share
For joint marketing with other companies	No	We don't share
For our affiliates' everyday business purposes Information about your transactions and experience	No	We don't share
For our affiliates' everyday business purposes Information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For non-affiliates to market to you	No	We don't share

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WHAT DOES PARVIN DO WITH YOUR PERSONAL INFORMATION?

SHARING PRACTICES

How often does Parvin notify me about its practices?	We must notify you about our sharing practices when you engage our services and each year while you are a client.
How does Parvin protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and offices.
How does Parvin collect my personal information?	We collect certain personal information from you, for example, when you open an account.
Why can I not limit all sharing?	Federal law gives you the right to limit sharing only for: <ul style="list-style-type: none"> ▪ affiliates' everyday business purposes – information about your creditworthiness; ▪ affiliates to market to you; and ▪ non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing.
How does Parvin treat my personal information once I am no longer a client?	The Firm will provide nonpublic information about former clients only if required to do so by law or regulation or to those parties who need such information in order for the Firm to carry out any continued obligation with respect to the services covered by the former adviser/client relationship.

DEFINITIONS

Everyday business purposes	The actions necessary for investment firms to run their businesses and manage client accounts, such as <ul style="list-style-type: none"> ▪ processing transactions, client correspondence, auditing services; and ▪ responding to legal requirements.
Affiliates	Companies related by common ownership or control. They can be financial and/or non-financial companies.
Non-affiliates	Companies not related by common ownership or control. They can be financial and/or non-financial companies. <ul style="list-style-type: none"> ▪ Parvin does not share with non-affiliates so they can market to you.
Joint marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ▪ Parvin does not jointly market.

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