

PRIVACY POLICY

Nadaje Holdings LLC dba Eustace Advisors ("EA") recognizes that our client relationships are based on integrity and trust. We work hard to maintain our client's privacy and to preserve the private nature of our client relationships. We place the highest value on the information shared with us, and the proper handling of client personal information by EA is a top corporate priority.

This Privacy Policy is intended to help our clients understand what information we collect, how we use it, and how we protect their personal information. We will never sell our clients' personal information.

Why We Collect Your Information

We gather information about you so that we can:

- Establish and implement the financial and corporate management related services we provide to you; and
- Comply with the Federal and State laws and regulations that govern us.

What Information We Collect and Maintain

We may collect the following types of "nonpublic personal information" ("NPI") about you:

- Information about your identity, such as your name, address, social security number, and date of birth;
- Financial information, such as account numbers, assets, liabilities, income, expenses, taxes and insurance;
- Information that we generate to service your financial needs; and
- Information that we may receive from third parties in connection with the services we provide you.

What Information We Disclose

We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. EA may disclose client's NPI: (1) to individuals and/or entities not affiliated with EA, including, but not limited to third-parties that assist in the supervision or management of your account(s) (i.e., sub-advisers, account custodian, record keeper, attorney, etc.); (2) to service providers contracted by us in order for us to perform the duties in furtherance of the client's engagement with EA (i.e. client management systems, archiving technology vendors, cloud service providers, etc.); (3) to your authorized representative or power of attorney; (4) when we receive your prior consent; (5) in connection with a proposed or actual sale, merger, or transfer of all or a portion of our business; and (6) as otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations.

In the event that EA has a change to its client privacy policy that would allow it to disclose non-public information not covered under applicable law, EA will allow its clients the opportunity to opt-out of such disclosure.

How We Protect Your Personal Information

It is our policy to restrict access to all current and former clients' NPI to those employees and affiliated/non-affiliated entities who need access to that information in order to provide products or services in furtherance of the client's engagement of EA. EA permits only authorized employees who have acknowledged receipt and understanding of our Privacy Policy to have access to client information, and EA maintains physical, electronic, and procedural safeguards to protect our client's NPI. EA strives to only recommend third-party service providers that have similar privacy policies; however, clients are encouraged to request each specific firm's written policy for review.

Former Clients

Even if we cease to provide you with financial services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic information with strict confidentiality. We maintain all records regarding all former clients for the retention period required by law.

Contact Us

Clients are encouraged to discuss any questions regarding privacy policies and procedures directly with Raymond Eustace, Chief Compliance Officer of EA. Please contact Raymond Eustace at 910-377-5021.