

TRIUMPH CAPITAL MANAGEMENT

PRIVACY POLICY STATEMENT

February 14, 2022

Triumph Capital Management (“TCM”) is committed to protecting your privacy, including the types of information we collect about you, how we use and share that information, and how you can instruct us to limit certain types of information sharing.

Financial companies choose how they share your personal information. Federal law gives consumers 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.

How We Collect Information

We collect personal information about you in a number of ways.

- **Application and Agreement:** We collect information from you when enrolling in one of our services. The information may include your name, social security number, date of birth, marital status, employer, income, assets, as well as details about your interests, risk tolerance, investment objectives, and experience.
- **Transactions:** We collect and maintain information regarding your account activity, including your transactions, balances, positions, and history. This information allows us to administer your account and provide the services you requested.
- **Website:** When you visit our website, we may use cookies or other similar tools to enhance your web experience. These tools enable us to recognize you when returning to our website and maintain your web session while you browse throughout the website, as well as help us provide you with a better, more personalized experience. Cookies do not, standing alone, identify you as an individual by name or account number, they merely recognize your browser.

How We Share Information About You

We provide access to information about you to outside companies in certain limited circumstances.

- To help us process transactions for your account.
- When we use another company to provide services for us, such as printing and mailing your account statements.
- When we believe that disclosure is required or permitted under law. For example, we may be required to disclose personal information to cooperate with regulatory or law enforcement authorities, to resolve consumer disputes, to perform credit/authentication checks, or for risk control.
- When we enter into a joint marketing agreement with another financial institution in order to provide you with a financial product or service. We only make such agreements with companies that we believe can help us provide a financial product or service that will benefit you.

You may instruct us not to share information about you with outside companies for joint marketing purposes, as explained under “How to Limit the Sharing of Information About You”.

How to Limit the Sharing of Information About You

Federal law gives you the right to limit sharing for affiliates’ everyday business purposes-information about your creditworthiness, affiliates from using your information to market to you, and sharing for non-affiliates to market to you.

State laws and individual companies may give you additional rights to limit sharing. We will comply with state laws that apply to the disclosure or use of information about you.

If you prefer, you may choose to limit the information we share about you with our affiliates and outside companies. Specifically, you may instruct us:

- Not to share with our affiliates' consumer reports and other personal information about you that may be used to determine your eligibility for credit (for example, information about your income, profession, or employment status).
- Not to allow our affiliates to market their financial products or services to you based on information they receive from us about your eligibility for credit or your transactions and experience with us.
- Not to share personal information about you with an outside company for joint marketing purposes.

You may exercise this choice by calling us at: 877-652-8607 or by writing us at: info@TriumphCapitalManagement.com

You may make your privacy choice at any time and it will remain in effect until you change it. Your choice will be applied to you as an individual and will automatically extend to all of your accounts with us.

Protecting Your 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, using secured files, and physical security/surveillance.

We take precautions to ensure the information we collect about you is protected and accessed only by authorized individuals and organizations. Our employees are trained on our privacy policy and are required to safeguard your personal information.

Outside companies we use to provide support services are not allowed to use information about our clients for their own purposes and are obligated to maintain strict confidentiality.

Identity Theft

Identity theft occurs when someone uses your personal information such as your name, social security number, credit card number or other identifying information, without your permission to commit fraud or other crimes. Identity theft is a serious concern to all of us. Safeguarding information to help protect you from identity theft is our priority.

You can also help protect your identity and accounts. Here are a few safety tips to remember:

- TCM will never request your account number, login password, or social security number in a non-secure or unsolicited email communication.
- If you receive an email that warns you, with little or no notice, that an account of yours will be shut down unless you reconfirm your billing information, do not reply or click the link in the email.
- When you enter account or personal information on a website, ensure that it is over a secure connection.
- Shred documents that contain personal information after use.
- Check your credit report regularly for unauthorized activity and protect your personal identification numbers and personal data.

If you have been a victim of identity theft, please contact the fraud departments of each of the three major credit bureaus and please let TCM know immediately.

Keeping You Informed – Our Commitment

We will provide you with advance notice of important changes to our Privacy Policy and information-sharing practices. Your use of our services following these changes means that you accept the revised Privacy Policy.

How To Unsubscribe From Marketing Emails

If you would like to unsubscribe from marketing emails sent by TCM you can do so by clicking the unsubscribe link included in the footer of our emails.

Correcting and Updating Your Information

The accuracy of your personal information is important to us. If you are a client and have a concern about your personal or account information maintained at TCM, or want to correct, update, or confirm your information, please email us at info@TriumphCapitalManagement.com or call us at (877) 652-8607. We will be happy to review and update your records.

Triumph Capital Management

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