

# **BlueSquare Capital Advisors, LLC**

## ***Privacy Policy of Client Information***

Bluesquare Capital Advisors, LLC ("Bluesquare Capital") believes it is essential that we maintain the privacy of the nonpublic personal information that clients provide to us and that we obtain in connection with providing services. Bluesquare Capital has a standing policy of protecting the confidentiality and security of information we collect about our clients. We will not share non-public information about our clients ("Information," as further described below) with third parties, except for the specific purposes described below. This notice describes the Information we may gather and the circumstances under which we may share it. Because we must maintain accurate records, Bluesquare Capital has established procedures to maintain the accuracy of client information and to keep such information current and complete.

Bluesquare Capital limits the use, collection, and retention of such information to what we believe is necessary or useful to conduct our business and to provide our services. Information collected may include telephone numbers, addresses, tax identification numbers, employment status, date of birth, and key financial information for individuals and other identifying documentation for institutions.

In providing products and services to our clients, we collect nonpublic personal information from the following sources:

- Information we receive from clients on applications or other forms;
- Information about client transactions with us, or others; and
- Information we receive from reporting agencies, as well as other various materials that we may use in the normal course of our business.

Bluesquare Capital places strict limits on who receives information regarding a client's data. We do not disclose nonpublic personal information we collect to others. However, because we rely on certain third parties for services that enable us to provide our advisory services, such as our attorneys, auditors, other consultants, and brokers who, in the ordinary course of providing their services, may require access to information, we may share non-public personal information with such third-parties. Additionally, we will share such information where required by legal or judicial process, such as a court order, or otherwise to the extent permitted under the federal privacy laws.

We restrict access to nonpublic personal information about our clients to employees who need access to such information in order to conduct their work. Even if a client no longer has a relationship with Bluesquare Capital, our Privacy Policy will continue to apply to the clients information.

Our employees are required to protect the confidentiality of Information and to comply with our established policies. They may access Information only when there is an appropriate reason to do so. We also maintain physical, electronic and procedural safeguards to protect Information, which comply with Federal standards. Employees who violate our Privacy Policy are subject to internal disciplinary actions and, as appropriate, legal sanctions. Our employees are

instructed, continuously reminded and trained to safeguard all confidential client Information.

Bluesquare Capital reserves the right to change these Privacy Principles, and any of the policies or procedures described above, at any time without prior notice. However, clients will be promptly provided with a current copy of our privacy notice upon material changes or upon request. So long as a client remains an active customer, they will receive a current copy of our privacy notice at least annually. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights, and do not modify or amend any agreements we have with our clients.

Questions concerning this privacy policy may be directed to us by calling (646-661-1140), or via email at [rcrafton@bluesquarecap.com](mailto:rcrafton@bluesquarecap.com).