

PRIVACY POLICY/REGULATION S-P

Eastwind Capital, LLC (EWC) views protecting its clients' private information as a top priority and, pursuant to the requirements of the Gramm-Leach-Bliley Act (the "GLBA"), EWC has instituted the following policies and procedures to ensure that client information is kept private and secure.

This policy serves as formal documentation of EWC's ongoing commitment to the privacy of its clients. All employees will be expected to read, understand, and abide by this policy and to follow all related procedures to uphold the standards of privacy and security set forth by EWC. This Policy, and the related procedures contained herein, is designed to comply with applicable privacy laws, including the GLBA, and to protect nonpublic personal information of EWC's clients.

In the event of new privacy-related laws or regulations affecting the information practices of EWC, this Privacy Policy will be revised as necessary and any changes will be disseminated and explained to all personnel.

Scope of Policy

This Privacy Policy covers the practices of EWC and applies to all nonpublic personally identifiable information of our current and former clients.

Overview of the Guidelines for Protecting Client Information

In Regulation S-P, the Securities and Exchange Commission (the "SEC") published guidelines, pursuant to section 501(b) of the GLBA, that address the steps a financial institution should take in order to protect client information. The overall security standards that must be upheld are:

- Ensure the security and confidentiality of client records and information;
- Protect against any anticipated threats or hazards to the security or integrity of client records and information; and
- Protect against unauthorized access to or use of client records or information that could result in substantial harm or inconvenience to any client.

Employee Responsibility

1. Each employee has a duty to protect the nonpublic personal information of clients collected by EWC.
2. No employee is authorized to disclose or use the nonpublic information of clients on behalf of EWC.
3. Each employee has a duty to ensure that nonpublic personal information of EWC's clients is shared only with employees and others in a way that is consistent with EWC's Privacy Notice and the procedures contained in this Policy.
4. Each employee has a duty to ensure that access to nonpublic personal information of EWC's clients is limited as provided in the Privacy Notice and this Policy.

5. No employee is authorized to sell, on behalf of EWC or otherwise, nonpublic information of EWC's clients.
6. Employees with questions concerning the collection and sharing of, or access to, nonpublic personal information of EWC's clients must look to EWC's CCO for guidance.
7. Violations of these policies and procedures will be addressed in a manner consistent with other Company disciplinary guidelines.

Information Practices

EWC collects nonpublic personal information about clients from various sources. These sources and examples of types of information collected include:

- Product and service applications or other forms, such as client surveys, agreements, etc – typically name, address, age, social security number or taxpayer ID number, assets and income;
- Transactions - account balance, types of transactions and investments;
- Other third party sources.

Disclosure of Information to Nonaffiliated Third Parties – “Do Not Share” Policy

EWC has a “do not share” Privacy Policy. It does not disclose any nonpublic personal information about clients or former clients to nonaffiliated third parties, except under one of the GLBA privacy exceptions, as described below.

Under no circumstances does EWC share credit-related information, such as income, total wealth and other credit header information with these nonaffiliated third parties.

Types of Permitted Disclosures – The Exceptions

Regulation S-P contains several exceptions that permit Eastwind to disclose client information (the “Exceptions”). For example, Eastwind is permitted under certain circumstances to provide information to non-affiliated third parties to perform services on EWC's behalf. In addition, there are several “ordinary course” exceptions, which allow Eastwind to disclose information that is necessary to effect, administer, or enforce a transaction that a client has requested or authorized. A more detailed description of these Exceptions is set forth below.

1. Service Providers

EWC may from time to time have relationships with nonaffiliated third parties that require it to share client information in order for the third party to carry out services for EWC. These nonaffiliated third parties would typically represent situations where EWC or its employees offer products or services jointly with another financial institution, thereby requiring EWC to disclose client information to that third party.

Every nonaffiliated third party that falls under this exception is required to enter into an agreement that will include the confidentiality provisions required by Regulation S-P, which ensure that each such nonaffiliated third party uses and re-discloses client nonpublic personal information only for the purpose(s) for which it was originally disclosed.

2. Processing and Servicing Transactions

EWC may also share information when it is necessary to effect, administer, or enforce a transaction for our clients or pursuant to written client requests. In this context, “Necessary to

effect, administer, or enforce a transaction” means that the disclosure is required, or is a usual, appropriate, or acceptable method:

- To carry out the transaction or the product or service business of which the transaction is a part, and record, service, or maintain the consumer's account in the ordinary course of providing the financial service or financial product;
- To administer or service benefits or claims relating to the transaction or the product or service of which it is a part;
- To provide a confirmation, statement, or other record of the transaction, or information on the status or value of the financial service or financial product to the consumer or the consumer's agent or broker; or
- To accrue or recognize incentives or bonuses associated with the transaction that is provided by EWC or any other party.

3. Sharing as Permitted or Required by Law

EWC may disclose information to nonaffiliated third parties as required or allowed by law. This may include, for example, disclosures in connection with a subpoena or similar legal process, a fraud investigation, recording of deeds of trust and mortgages in public records, an audit, or examination, or the sale of an account to another financial institution.

EWC has taken the appropriate steps to ensure that it is sharing client data only within the Exceptions noted above. EWC has achieved this by understanding how EWC shares data with its clients, their agents, service providers, parties related to transactions in the ordinary course or joint marketers.

Provision of Opt Out

As discussed above, EWC currently operates under a “do not share” policy and therefore does not need to provide the right for its clients to opt out of sharing with nonaffiliated third parties. If our information sharing practices change in the future, we will implement opt-out policies and procedures and make appropriate disclosures to our clients.

Safeguarding of Client Records and Information

EWC has implemented internal controls and procedures designed to maintain accurate records concerning clients' personal information. EWC's clients have the right to contact EWC if they believe that Company records contain inaccurate, incomplete, or stale information about them. EWC will respond in a timely manner to requests to correct information. To protect this information, EWC maintains appropriate security measures for its computer and information systems, including the use of passwords and firewalls.

Additionally, EWC will use shredding machines, locks and other appropriate physical security measure to safeguard client information stored in paper format. For example, employees are expected to secure client information in locked cabinets when the office is closed.

Security Standards

EWC maintains physical, electronic, and procedural safeguards to protect the integrity and confidentiality of client information. Internally, EWC limits access to clients' nonpublic personal information to those employees who need to know such information in order to provide

products and services to clients. All employees are trained to understand and comply with these information principles.

EWC protects confidential client information including but not limited to consumer report or any compilation of consumer report information derived from a consumer report by maintaining some information in locked filing cabinets and shredding such information when then information is no longer needed by EWC. All employees are trained to understand and comply with these information principles.

Privacy Notice

EWC has developed a Privacy Notice, as required under Regulation S-P, to be delivered to clients initially and on an annual basis. The notice discloses EWC's information collection and sharing practices and other required information and has been formatted and drafted to be clear and conspicuous. The notice will be revised as necessary any time information practices change.

Privacy Notice Delivery

- **Initial Privacy Notice** - As regulations require, all new clients receive an initial Privacy Notice at the time when the client relationship is established, for example on execution of the agreement for services.
- **Annual Privacy Notice** - The GLBA regulations require that disclosure of the Privacy Policy be made on an annual basis. EWC will deliver its annual Privacy Notice in conjunction with the annual offer of its Form ADV Part II.

Revised Privacy Notice

Regulation S-P requires that EWC amend its Privacy Policy and distribute a revised disclosure to clients if there is a change in EWC's collection, sharing, or security practices.