

## PRIVACY POLICY

<b>FACTS</b>	<b>WHAT DOES LAURUS INVESTMENT COUNSEL DO WITH YOUR PERSONAL INFORMATION?</b>
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<b>WHY?</b>	Financial companies choose how they share your personal information. Applicable U.S. federal law gives consumers the right to limit some but not all sharing. U.S. federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
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<b>WHAT?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. The information can include:</p> <ul style="list-style-type: none"> <li>▪ <b>Social Security number</b></li> <li>▪ <b>Investment income</b></li> <li>▪ <b>Account balances and account transactions</b></li> <li>▪ <b>Assets and transaction history</b></li> </ul>
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<b>HOW?</b>	All financial companies need to share clients' personal information to run the everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Laurus Investment Counsel ("Laurus" or the "Firm") chooses to share; and whether you can limit this sharing. We do not disclose nonpublic personal information about our clients or former clients to third parties other than as described below. Where Laurus does share personal information with a trusted third party, it does so under strict terms that require the information to be used only for the purpose for which it was disclosed, kept confidential and protected by appropriate security safeguards.
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Reasons we can share your personal information	Does Laurus share?	Can you limit this sharing?
<b>For everyday business purposes:</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	<b>Yes</b>	<b>No</b>
<b>For marketing purposes:</b> to offer our products and services to you	<b>No</b>	<b>We don't share</b>
<b>For joint marketing with other financial companies</b>	<b>No</b>	<b>We don't share</b>
<b>For joint marketing with solicitors</b>	<b>Yes</b>	<b>No</b>
<b>For our affiliates to market to you:</b>	<b>No</b>	<b>We don't share</b>
<b>For non-affiliates to market to you:</b>	<b>No</b>	<b>We don't share</b>

<b>To limit our sharing</b>	<p>Call 844.430.5501 or visit us online at <a href="http://www.lauruscounsel.com">http://www.lauruscounsel.com</a>.</p> <p>Please note: If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us any time to limit our sharing.</p>
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<b>QUESTIONS?</b>	Call 844.430.5501 or visit us online at <a href="http://www.lauruscounsel.com">http://www.lauruscounsel.com</a> .
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WHO WE ARE	
Who is providing this notice?	LAURUS INVESTMENT COUNSEL

WHAT WE DO	
How does Laurus protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with U.S. federal law. These measures include computer safeguards and secured files and buildings.
How does Laurus collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> <li>▪ <b>Open an account or give us your contact and income information</b></li> <li>▪ <b>Seek advice about your investments</b></li> <li>▪ <b>Enter into an investment advisory contract</b></li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>U.S. federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> <li>▪ sharing for affiliates everyday business purposes - information about your creditworthiness</li> <li>▪ affiliates from using you information to market to you</li> <li>▪ sharing for non-affiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. In order to provide you with the services for which you have engaged Laurus, the Firm relies on a number of third parties to provide support services, including professional, legal, accounting and technical support.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.

DEFINITIONS	
Affiliates	<p>Companies related by common ownership or control. They can be financial or nonfinancial companies.</p> <ul style="list-style-type: none"> <li>▪ <b><i>Laurus Investment Counsel does not have any affiliates.</i></b></li> </ul>
Non-Affiliates	<p>Companies not related by common ownership or control. They can be financial or nonfinancial companies</p> <ul style="list-style-type: none"> <li>▪ <b><i>Laurus does not share information with non-affiliates so they can market to you.</i></b></li> </ul>
Joint Marketing	<p>A formal agreement between non-affiliated companies that together market financial products or services to you</p> <ul style="list-style-type: none"> <li>▪ <b><i>Laurus does not have joint marketing partners.</i></b></li> </ul>
Solicitors	<p>A formal agreement between non-affiliated companies that together market financial products or services to you</p> <ul style="list-style-type: none"> <li>▪ <b><i>Laurus has established a relationship with Tessera Capital Partners, LLC ("Tessera"). Laurus has signed a written contract with them, under which Tessera agreed to solicit and refer to Laurus prospective clients who may be interested in the investment advisory services of the firm. Tessera is not affiliated with and has no relationship with Laurus other than the relationship created by the contract between them.</i></b></li> </ul>

OTHER INFORMATION
This notice replaces all previous notices of our consumer privacy policy and may be amended from time to time. Laurus will inform you of updates or changes as required by law.