

## **COMMERCE ADVISORS, LLC PRIVACY POLICY**

We are committed to protecting your privacy. We have strict policies and procedures in place to keep your non-public personal information private. We will disclose your non-public personal information with non-affiliated third parties or affiliated companies to provide advisory services to you or as required or permitted by law. This notice serves as a summary of our practices. You do not need to take any action as a result of this notice unless you have any questions or concerns about it.

This Privacy Policy is being provided in accordance with the requirements of data privacy laws, including the EU General Data Protection Regulation 2016/679 (“GDPR”) or any other law relating to privacy or the processing of personal data and any statutory instrument, order, rule or regulation implemented thereunder, each as applicable to Commerce Advisors (collectively, “Data Protection Law”). References to “you” or an “investor” in this Privacy Notice mean any investor who is an individual, or any individual connected with an investor who is a legal person, as applicable.

### **Types of Information We Collect**

In order to conduct our advisory business, we may collect and store the following non-public personal information about you:

- (i) information that comes from your subscription forms or other forms or documents that you complete, such as name, address, telephone number, email address, social security number, birth date, employment status, net assets, income, current investments, and investment experience;
- (ii) information, including related information such as positions and balances, about your transactions with us, our affiliates and non-affiliated third parties;
- (iii) information received from a consumer reporting agency; and
- (iv) any other information that is pertinent to providing advisory services to you from other sources with your consent or the consent of your representative.

### **How We Protect the Confidentiality and Security of Your Non-Public Personal Information**

We have implemented procedures to protect your privacy. They include physical, administrative, and technical safeguards that are updated as new technologies are introduced. The only employees who have access to your personal records are those who need it to conduct business on your behalf or to provide you with products or services. These employees are informed of our procedures for adherence to confidentiality of client non-public personal information and of their responsibility in applying those procedures. We maintain physical electronic and procedural safeguards that meet or exceed federal and industry standards governing how non-public personal information should be stored. When possible, we contractually limit the information sharing ability on non-affiliated third parties with whom we share your non-public personal information.

## **Information-Sharing Practices**

*We do not disclose any non-public personal information about our prospective, current or former clients or investors to anyone to provide advisory services to you or as required or permitted by law.*

In order to effectively provide our investment advisory services, we must use the services of service providers and financial institutions, including various non-affiliated third parties, such as, but not limited to, account custodians and broker-dealers and affiliated companies such as, but not limited to, affiliated companies that can assist us with research, administrative support and governance. It may be necessary to disclose some or all of your non-public personal information collected from you, as described above, to these parties. However, we will disclose your non-public personal information only as is required to provide advisory services to you or as required or permitted by law.

Specifically, we may share non-public personal information that we collect from and about you with the following non-affiliated third parties:

- (i) governmental agencies, law enforcement authorities, and self-regulatory organizations to the extent required or permitted by law;
- (ii) non-affiliated third parties, with your consent or as directed by your representative;
- (iii) non-affiliated third parties, to the extent necessary to prevent actual or potential fraud, unauthorized transactions, claims or other liability; and
- (iv) non-affiliated third parties, for required institutional risk control or for resolving client disputes or inquiries.

## **Our Treatment of Information about Former Clients**

Protecting your privacy goes beyond our relationship with you as our client. Should your relationship with us terminate, we will not share your non-public personal information with non-affiliated third parties except as required or permitted by law.

## **Client Right to Correct, Amend or Delete Information**

You may submit a written request to us to correct, amend or delete any non-public personal information in our possession. We anticipate responding to your request within ten business days or as required by applicable state law.

## **Additional Information for Residents of the European Economic Area (EEA)**

*Personal Data Processed in Third Countries.* Your personal information will be processed in the United States, and other countries outside the EEA (“**Third Countries**”), that may not offer the same level of data protection as that afforded by the GDPR. We will process personal data (or ensure that it is processed) in such Third Countries in accordance with the requirements of Data Protection Law, which may include having appropriate contractual undertakings in legal agreements with service providers who process personal data on your behalf in such Third Countries.

Your rights. You may have certain rights under the GDPR in respect of your personal data that we hold, and which you may exercise. These rights are:

- to request access to your personal data;
- to request rectification of inaccurate or incomplete personal data;
- to request erasure of your personal data (a “right to be forgotten”);
- to restrict the processing of your personal data in certain circumstances;
- to object to our use of your personal data, such as where we have considered such use to be necessary for our legitimate interests;
- where relevant, to request the portability of your personal data;
- where you have given specific consent to the processing of your personal data, to withdraw your consent; and
- to lodge a complaint with the competent supervisory authority.

Please note that the right to be forgotten that applies in certain circumstances is not likely to be available in respect of the personal data we collect to satisfy our legal or regulatory obligations, as described above.

### **Changes in our Privacy Practices and Procedures**

You will be notified in writing of any amendments to our privacy practices and procedures. You will also be notified in writing on an annual basis of our privacy practices and procedures, even if no amendments have been made to them. If you have any questions or concerns about our privacy policy, please write Commerce Advisors, LLC, Attn: Privacy Inquiry, 5050 Poplar Avenue, Suite 2020, Memphis, TN 38157 or call us at (901) 260-6050.