

# Privacy Policy

## DeCamilla Capital Management, Inc.

In fulfilling our fiduciary duty, **DeCamilla Capital Management, Inc.** does it best to ensure the security and confidentiality of the personal information (i.e., information that specifically identifies a person or his/her/their accounts) we collect from you as our client. This nonpublic information is necessary to establish your accounts with a custodian, to process your transactions, and to provide you with the highest level of service. We are committed to client confidentiality. As required by federal law, following are the details of our Privacy Policy:

**(1) We do not sell your personal information to anyone.**

**(2) We do not disclose your personal information to third parties, except in the following limited situations:**

(a) We share some of the personal information we collect with our primary custodian (Schwab Advisor Services) or our client's established independent custodian so that they may assist us with custody, processing, and servicing your accounts and transactions. You will receive a copy of the custodian's policy and practices with respect to protection and disclosure of personal information.

(b) If we believe in good faith that disclosing such information is required or permitted under the law; for example, to satisfy requests from regulatory or law enforcement agencies or to resolve client disputes.

Other than these limited circumstances, we will not share your personal information with any third party unless you have specifically directed us to do so.

**(3) We do collect personal information in the normal course of business in order to manage your accounts and to provide you with service.**

(a) We collect the information you provide to your account custodian when you authorize us to manage your accounts.

We also collect the information you provide to us when you open an account with us. The personal information we collect may include your name, the name of your spouse and children's names, birth dates, addresses, phone numbers, email addresses, Social Security numbers, and information about your interests, assets, investments, insurance, health, employment, and investment experience.

(b) In order to manage your account and serve you, we collect and maintain personal information about your transactions, including account balances, positions, and history of activities. We may include your name or other data in internal client lists that reflect such information.

**(4) We protect the confidentiality and security of your personal information.**

(a) We restrict access to your personal information to our employees and agents for business purposes only. All employees are instructed and required to safeguard your personal information. We maintain physical and procedural safeguards to protect your personal information.

**(5) We will notify you in advance if our Privacy Policy changes with respect to disclosing your personal information and you will be given the opportunity to opt out of any such disclosure.**

**(6) We attempt to keep your personal information current. Please contact us at once if you identify any inaccuracy in your personal information.**

Contact us directly with any questions or concerns regarding our Privacy Policy.