



Beacon Capital Management

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PRIVACY POLICY

Beacon Capital Management, LLC (also referred to as the “firm”, “we”, or “our”), as a Registered Investment Adviser, is covered under the definition of a “financial institution” under the Gramm-Leach-Bliley Act and the Securities and Exchange Commission’s (“SEC”) Privacy of Consumer Financial Information Rule (“Regulation S-P”).

The staff of Beacon Capital Management understands that providing personal information is an act of trust. Beacon Capital Management values its clients’ trust and confidence. We will never sell or share nonpublic personal information obtained from or about clients without written consent. All information provided by clients to Beacon Capital Management and its staff, and information and advice furnished to clients by us, shall be treated as confidential and shall not be disclosed to affiliated or unaffiliated third parties, except as permitted or directed by clients with written authorization, by application to facilitate the investment services offered by the firm via an unaffiliated financial services provider, or as required by any rule, regulation or law.

Commitment to Your Private Information. Beacon Capital Management is committed to safeguarding the confidential information of its clients. Beacon Capital Management holds all personal information provided by clients in the strictest confidence and it is the objective of the firm to protect the privacy of all clients. Except as permitted or required by law, Beacon Capital Management does not share confidential information about clients with non-affiliated parties. It is our policy to restrict access to all current and former clients’ information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those

employees and affiliated/non-affiliated entities who need to know that information in order to provide products or services in furtherance of the client's engagement of Beacon Capital Management. Beacon Capital Management permits access to client information only to authorized employees who have acknowledged receipt and understanding of our Privacy Policy. Employees violating Beacon Capital Management's Privacy Policy will be subject to our disciplinary process. If there are any changes to this policy, we will provide clients with written notice and clients will be provided an opportunity to direct Beacon Capital Management as to whether such changes are permissible.

Why We Collect and How We Use Information. To conduct regular business, Beacon Capital Management may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to the firm
- Information about the client's transactions implemented by the firm or others
- Information developed as part of financial plans, analyses, or investment advisory services

To administer, manage, service, and provide related services for client accounts, it is necessary for Beacon Capital Management to provide access to client information within the firm and to non-affiliated companies, with whom we have entered into agreements.

The disclosure of information contained in any document completed by the client for processing and/or transmittal by Beacon Capital Management to facilitate the commencement/continuation/termination of a business relationship between the client and/or between Beacon Capital Management and a non-affiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, record keeper, insurance company, etc.), including, but not limited to, information contained in any document completed and/or executed by the client in furtherance of the client's engagement of Beacon Capital Management (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding non-affiliated third-party service provider.

Sharing Information with Other Companies Permitted Under Law. Beacon Capital Management may disclose the client's information: (1) to individuals and/or entities not affiliated with Beacon Capital Management, including, but not limited to, the client's other professional advisors and/or certain service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, record keeper, proxy management service provider, etc.) that may be recommended or engaged by Beacon Capital Management in furtherance of the client's engagement of Beacon Capital Management; (2) when required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. Since Beacon Capital Management shares nonpublic information solely to service client accounts, the firm does not disclose any nonpublic personal information about the firm's customers or former customers to anyone, except as permitted by law. In the event that the firm has a change to its client privacy policy that would allow it to disclose non-public information not covered under applicable law, the firm will allow its clients the opportunity to opt out of such disclosure. Finally, Beacon Capital Management strives to only recommend financial services providers that share its privacy policies; however, clients are encouraged to request each specific firm's written policy for review.

Information Security. Beacon Capital Management maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients' nonpublic personal information. Through this policy and its underlying procedures, Beacon Capital Management attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information. Beacon Capital Management maintains client records in a controlled environment and records are only available to authorized persons of the firm who have a need to access client information in order to deliver advisory services or respond to client requests. Beacon Capital Management's policy to protect client information extends beyond the termination of the Engagement Letter or Client Agreement.

Children. Our company website is not directed to children under the age of 18 years. By accessing and using our website, you represent and warrant that you are at least 18 years old.

Former Clients. Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you, and we will continue to treat your nonpublic information with strict confidentiality.

Changes to this Policy. Beacon Capital Management will provide each client with initial notice of the firm's current privacy policy when the client relationship is established. We will also provide each client with a new notice of the firm's current privacy policy at least annually. If, at any time, Beacon Capital Management adopts material changes to its privacy practices, the firm shall provide each client with a revised notice reflecting the new privacy practices.

Website Analytics, Cookies, and Marketing Technologies. Beacon Capital Management uses cookies, pixels, tags, and similar technologies ("Tracking Technologies") to collect information about how visitors access and use our website. This information may include IP address, browser type, device identifiers, pages visited, time spent on pages, links clicked, and other browsing activity. We use this information to operate and improve our website, understand user engagement, enhance user experience, and support our marketing and advertising efforts.

We may also engage third-party service providers, analytics providers, advertising partners, and data partners that assist us in analyzing website activity, measuring advertising performance, and developing marketing audiences. These third parties may use Tracking Technologies to collect or receive information from our website and other online sources and may combine that information with other data they maintain.

In certain cases, information collected through these technologies may be used to identify or infer general business or household information associated with website visitors and to help us deliver relevant marketing communications, including digital advertising and direct mail, as permitted by applicable law.

Beacon Capital Management does not use information collected through Tracking Technologies to make investment decisions or provide investment advice to any individual.

You may adjust your browser settings to refuse some or all cookies or to alert you when cookies are being used. Please note that disabling cookies may affect the functionality of certain portions of our website.

Contact Us: Clients are encouraged to discuss any questions regarding privacy policies and procedures directly with Yancey Wade, Chief Compliance Officer of Beacon Capital Management. Contact information: Yancey.wade@beaconcm.com, 615-224-9794.