



NOTICE OF OUR PRIVACY POLICY

Protecting the privacy of our clients is important to Ziegler Capital Management, LLC doing business as ZCM ("ZCM"). This notice describes the practices and policies through which ZCM maintains confidentiality and protects the security of your non-public personal information.

What Information We Collect

In the course of providing services to you, ZCM may collect the following types of "non-public personal information" about you:

- Information we receive from you on applications or other forms, such as your name, address and social security number, the types and amounts of investments and bank account information.
- Information about your transactions with us and others, as well as other account data.
- "Non-public personal information" is non-public information about you that we obtain in connection with providing a financial service to you, such as the information described in the above examples.

What Information We Disclose

We do not disclose non-public personal information about you or any of our former clients to anyone, except as permitted by law. In the normal course of serving clients, information we collect may be shared with companies that perform various services such as investment managers, custodians and broker-dealers. These companies will use this information only as necessary to provide services to you and as allowed by applicable law. Where ZCM 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.

Certain investment advisers and other financial services entities may be deemed to be related merely because we share common owners. ZCM, GIA Partners, LLC ("GIA"), Greenbacker Capital ("Greenbacker"), Mar Vista Investment Partners ("Mar Vista"), Wavelength Capital Management ("Wavelength"), and Emerald Advisers, LLC and Emerald Mutual Fund Advisers Trust (collectively, "Emerald") are owned by a subsidiary of 1251 Capital Group, Inc. GIA, Greenbacker, Mar Vista, Wavelength, Emerald, and ZCM do not share accounts, systems, or nonpublic personal information about you or any of our former clients.

Confidentiality and Security Procedures

To protect your personal information, we permit access only by authorized employees. We maintain physical, electronic, and procedural safeguards to protect the confidentiality, integrity, and security of your non-public personal information.

We will continue to adhere to the privacy policies and practices in this notice even after your account is closed or becomes inactive.

How to Limit Sharing

Per Federal law, you may limit sharing of any non-public personal information. Please contact ZCM at (844) 265-9675 or compliance@zcm.com to limit any of the below activities.

- Sharing of affiliates' everyday business purposes – information about your creditworthiness
- Affiliates from using your information to market to you
- Sharing for nonaffiliates to market to you