

KARNER BLUE CAPITAL, LLC

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PRIVACY POLICY

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. Within our firm we restrict access to your nonpublic personal information to those persons who need to know that information to provide financial services to you or to otherwise conduct our business. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to safeguard your nonpublic personal information. We do not sell your information to third parties.

TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

In order to provide you with financial products and services, we collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This information can include, but is not limited to, your name, address, contact information, social security number, date of birth, banking information, financial account numbers and/or balances, sources of income, credit card numbers or information, assets, employment status, dependent information, investment experience, and financial objectives. We will also collect information about you from your transactions with us, including account activity, payment history and products or services purchased. In addition, we may collect information about you from on-line forms that you complete, site visiting data and on-line information collecting devices commonly called "cookies".

PARTIES TO WHOM WE DISCLOSE INFORMATION

All investment advisers may need to share personal information to run their everyday business. We may share your personal information for the following reasons:

- Everyday business purposes, such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus;
- Marketing KBC's products and services to clients; and
- Joint marketing with other financial companies.

If you are a new customer we may begin sharing your information on the day you sign our investment management agreement. When you are no longer our customer, we may continue to share your information only as described in this notice. However, you can contact us at any time to limit our sharing of your information.

PROTECTING CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and buildings.

FEDERAL & STATE LAW ALLOWS YOU TO LIMIT SHARING - OPTING OUT

Federal law gives you the right to limit (i) sharing for affiliates' everyday business purposes, but only with respect to information about your creditworthiness, (ii) affiliates from using your information to market to you, and (iii) sharing for non-affiliates to market to you. We currently do not have affiliates and we do not share your information with non-affiliates except for certain financial institutions pursuant to joint marketing agreements. State laws may give you additional rights to limit sharing.

OPT-IN FOR CERTAIN STATES

Unless you have opted-in to the sharing of your personal information, if the mailing address for your account is in California, Massachusetts, North Dakota, or Vermont we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as otherwise permitted by applicable state law.

DEFINITIONS

An "affiliate" is any company that is related to us by common ownership or control. They can be financial or non-financial. A "non-affiliate" is any company that is not related by common ownership or control. They can be financial or non-financial. "Joint marketing" is a formal agreement between non-affiliated financial companies that together market financial services or products to you. This may include banks, credit unions or other financial institutions with which we enter into a joint marketing agreement.

Please call us if you have any questions.

Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.

October 23, 2019