



PRIVACY NOTICE
(Information Security Program) of
Steel Grove Capital Advisors, LLC

This is for your information only. No action is required on your part.

At Steel Grove Capital Advisors, LLC, protecting your privacy is very important to us. We want you to understand what information we collect and how we use it. We collect and use “nonpublic private information” in order to provide our clients with a broad range of financial services as effectively and conveniently as possible. We treat nonpublic personal information in accordance with our privacy policy.

“Nonpublic personal information” is nonpublic information about you that we obtain in connection with providing a financial service or product to you.

What Information Do We Collect?

In order to fulfill our obligations to you, we need certain information. Generally, this includes your name, address, social security number, date of birth, account numbers, and information about your income. We may also have access to other sensitive information, such as credit scores, income tax information and so forth.

Where Do We Get This Information?

We may collect nonpublic personal information about you from a variety of sources, such as:

- Information that we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates or others, such as the custodian(s) of your account(s); and
- Information we receive from non-affiliated third parties, including consumer reporting agencies.

What Information Do We Disclose and To Whom Do We Disclose It?

We do not disclose any nonpublic information about you without your express consent, except as permitted by law and as needed to provide the services you have requested. This applies to current as well as former clients. We restrict access to your nonpublic personal information to those who need to know that information in order to provide products or services to you. We do not share cell phone numbers or consent for the use of cell phones for business communications with any third parties for promotional or commercial purposes.

Our “affiliates” are companies with which we share common ownership. We will share your information with our affiliates **Worthington Capital Management** and **Steel Grove Realty Advisors** only if necessary to provide the services for which you have engaged our firm.

Our Security Procedures

We maintain physical, electronic and procedural safeguards to protect your nonpublic personal information. This includes measures to protect your information in the course of its disposal.