



PRIVACY POLICY

Effective: March 31, 2015.

Our Commitment to You

Candent Capital, LLC ("Candent") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Candent (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

Candent does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you as discussed below.

CANDENT CAPITAL, LLC WEBSITE PRIVACY POLICY

WHAT INFORMATION DO WE COLLECT FROM YOU?

This policy applies to information collected from or submitted to the Candent website ("Website"). We do not collect any personally identifiable information about visitors viewing publicly available areas of our Website. For example, your name, address, phone numbers, Social Security number or email addresses are not collected when you view our Website. We will collect names, emails or phone numbers of visitors that choose to email Candent or interact with Candent via our Website. Examples of such interaction include posting questions to Candent or leaving comments on the Website. The information enables us to respond to correspondence and to verify the sender.

Candent may collect names, emails, phone numbers and other forms of personal identifiable information for visitors to private portions of our Website that includes access to websites and applications from third party providers and require users to provide their personal login ids and passwords authorized by Candent. Depending on the third party provider website or application, this information may be anonymous or it may be associated with you.

We may collect information that your browser or device typically sends to our servers when you visit our Website. For example, your browser or device may tell us your IP address (which may tell us your general location), when and the type of browser and device you used to reach our Website. Your browser may also tell us information about the page that led you to our Website and the search terms you entered into a search engine that led you to our website.

Candent may collect information about how you use our Website by using cookies and similar technologies that send small amounts of data to your computer from our web server and stored on the storage media of your computer. This data anonymously identifies you as a unique user of our Website and helps us with the ongoing maintenance of our Website. This technology may not provide us with information regarding your name, address, phone number or email address or any other personally identifiable information.

HOW WE MAY USE INFORMATION THAT WE MAY COLLECT

We do not share any information collected from the publically available sections of our website with anyone outside of Candent. Candent reserves the right to disclose any information that we collect when required to comply with a valid subpoena, court order or as otherwise permitted or required by law. For visitors that submit their email addresses or other personally identifiable information to us requesting correspondence with Candent, we do not use such information for any purposes other than correspondence and will not disclose such information outside of Candent.

OTHER THIRD PARTY WEBSITES

Our Website may contain for your convenience links to public websites controlled and maintained by third parties. Such websites do not require personal login ids and passwords authorized by Candent. We do not have any control over the content of public third party websites. Candent assumes no liability or responsibility for such sites, the content contained in them or the manner in which these sites collect or use information. This Website Privacy Policy does not govern the use of information collected by outside public third party websites that were not authorized by Candent.

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Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

Why you need to know?

Registered Investment Advisors (“RIAs”) share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

| | |
|--|---------------------------------|
| Social security or taxpayer identification number | Assets and liabilities |
| Name, address and phone number(s) | Income and expenses |
| E-mail address(es) | Investment activity |
| Account information (including other institutions) | Investment experience and goals |

Candent Capital, LLC

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www.candentcap.com

What sources do we collect information from in addition to you?

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| Custody, brokerage and advisory agreements | Account applications and forms |
| Other advisory agreements and legal documents | Investment questionnaires and suitability documents |
| Transactional information with us or others | Other information needed to service account |

How we share your information?

RIAs do need to share personal information regarding its clients to effectively implement the RIA’s services. In the section below, we list some reasons we may share your personal information.

| Basis for sharing | Sharing | Limitations |
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| <p>Servicing our Clients</p> <p>We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to:</p> <ul style="list-style-type: none"> • Processing transactions; • General account maintenance; • Responding to regulators or legal investigations; and • Credit reporting, etc. | <p>Candent may share this information.</p> | <p>Clients cannot limit the Advisors ability to share.</p> |
| <p>Administrators</p> <p>We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.</p> | <p>Candent may share this information.</p> | <p>Clients cannot limit the Advisors ability to share.</p> |

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| <p>Marketing Purposes</p> <p>Candent does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Candent or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.</p> | <p>Candent does not share personal information.</p> | <p>Clients cannot limit the Advisors ability to share.</p> |
| <p>Authorized Users</p> <p>In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative.</p> | <p>Candent does share personal information.</p> | <p>Clients can limit the Advisors ability to share.</p> |
| <p>Information About Former Clients</p> <p>Candent does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.</p> | <p>Candent does not share personal information regarding former clients</p> | <p>Clients can limit the Advisors ability to share.</p> |

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| <p>How do we protect your information?</p> |
| <p>To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.</p> |
| <p>Our employees are advised about Candent's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.</p> |
| <p>We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third party agreements.</p> |

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| <p>Changes to our Privacy Policy.</p> |
| <p>We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.</p> |
| <p>Periodically we may revise our Privacy Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.</p> |

State specific regulations

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| California | In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws. |
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Questions: You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (415) 742-1681.