

**CLEARWATER ADVISORS
AND
CLEARWATER ANALYTICS**

PRIVACY POLICY

Effective June 1, 2005

Clearwater Advisors and Clearwater Analytics are committed to maintaining the trust and confidence of our customers. We want you to understand how we protect your privacy when we collect and use information about you, and the measures we take to safeguard that information. Keeping customer information secure and private is a priority for us.

The following describes our Privacy Policy. Please take a moment to review it and feel free to contact us with any questions. Thank you for the trust you have placed in us. We look forward to working very hard to continue to earn your trust.

What types of non-public personal information do we collect about you?

In the course of providing service to you, we collect non-public personal information about you from the following sources:

- Information from you on account applications and other standard forms (for example, name, address, social security or employer identification number, assets, types and amounts of investments, transactions, and income);
- Information about your account transactions (for example, your account balance, payment history, parties to transactions, types and amounts of investments, transactions);
- Information we receive from consumer reporting agencies (for example, your credit worthiness and credit history);
- Information obtained when verifying the information you provide on applications or other forms (this may be obtained from your current or past employers, or from other institutions where you conduct financial transactions).

How do we protect the confidentiality and security of your non-public personal information?

Keeping your information secure is one of our most important responsibilities. We restrict access to non-public personal information about you to those employees and agents who need to know that information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your non-public personal information.

Do we disclose to any non-affiliated third parties your non-public personal information?

We do not sell, share or disclose your non-public personal information to non-affiliated third party marketing companies.

If we have a non-disclosure agreement or confidentiality agreement with you, we adhere strictly to its terms.

We may disclose non-public personal information about you under circumstances as permitted or required by law. These disclosures typically include information to process transactions on your behalf, to conduct our operations, to follow your instructions as you authorize, or to protect the security of our financial records.

Do we disclose within our family of affiliated companies your non-public personal information?

In the course of providing services to you, we are permitted by law to share within our family of affiliated companies information about our transactions or experiences with you (such as account balance or payment history).

What is our policy relating to former customers?

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

We reserve the right to change this policy at any time and you will be notified if any changes occur.

If you have any questions after reading this Privacy Policy, please contact us.

