

Ironshore Financial, LLC Privacy Notice

Ironshore Financial, LLC (Ironshore) respects the right to privacy and is fully committed to protecting the confidentiality of personal information we obtain from clients and visitors to our website. This Privacy Notice summarizes the administrative, technical and physical safeguards for maintaining the confidentiality of nonpublic personal information collected from our customers.

Non-public Personal Information

As an SEC-registered investment adviser, Ironshore complies with SEC Regulation S-P, which requires registered advisers to adopt policies and procedures to protect "nonpublic personal information" of natural person consumers and customers and to disclose to such persons policies and procedures for protecting that information. Nonpublic personal information can include nonpublic "personally identifiable financial information" plus any list, description or grouping of customers that is derived from nonpublic personally identifiable financial information.

Nonpublic personal information obtained by Ironshore for purposes of providing services pursuant to a current service agreement will not be furnished to nonaffiliated third parties for any purpose other than in furtherance of the aforementioned services. Notwithstanding the foregoing, Ironshore may share nonpublic personal information with any nonaffiliated third parties in the following circumstances:

- As required by regulatory authorities or law enforcement officials who have jurisdiction over Ironshore, or as otherwise required by any applicable law;
- If prior to the time of disclosure such information becomes part of the public knowledge or literature, not as a result of any action or inaction of Ironshore;
- To the extent reasonably necessary to prevent fraud and unauthorized transactions; and
- The party to which the nonpublic personal information applies provides written approval for disclosure of such information.

Any potential conflicts on whether information should be treated as confidential are resolved in favor of confidentiality.

Safeguarding Client Information

Ironshore maintains safeguards to comply with federal and state standards to protect each client's nonpublic personal information. Ironshore's safeguarding standards encompass

computer security standards, physical security of nonpublic personal information and established written procedures. Examples of important safeguards include:

- Access controls on computer systems that store nonpublic personal information, including controls to authenticate and permit access only to authorized individuals (e.g. username and passwords, etc.);
- Access restrictions at physical locations containing Ironshore customer information to permit access only to authorized individuals;
- Specific actions to be taken when Ironshore suspects or detects that unauthorized individuals have gained access to customer information systems, including appropriate reports to regulatory and law enforcement agencies.

Privacy and the Ironshore Website

Our website is located at <u>www.ironshorefinancial.com</u> (the "Site") and is a great way to find out more about our services, access informative articles, market information and financial calculators. Ironshore will not collect any personal, identifiable information without your knowledge.

Our Site creates a temporary data file commonly known as a cookie, which allows you to view some of our disclosure information. It may also track the areas of our Site that you visit. However, when you close your browser this cookie is automatically deleted from your system. We may collect information regarding the internet provider from which you are connecting to our Site, such as AOL or MSN. We may also track the website from which you linked to our Site. This information is used statistically and not to identify individuals.

You can visit the Site and remain anonymous by not providing any personal information. However, you may choose to share this information by completing applications, online forms or requesting that we contact you. Personal information includes, but is not limited to name, address, phone number, and email address. All forms are located in secured areas of our Site. When using secure areas of our Site to provide or access your personal information, the information is encrypted, making it indecipherable to third parties. Your browser will indicate that you are in a secure area by displaying a locked padlock in the bottom of the screen. We have taken all reasonable measures to protect the information entered and accessed on the website.

Privacy Notices

Ironshore will provide each customer with an initial copy of this Privacy Notice when the client relationship is first established, and an updated copy at least annually thereafter. Ironshore reserves the right to change this Privacy Notice at any time. If Ironshore adopts material changes to its Privacy Notice, we will provide each client with a revised copy of the Privacy Notice.

Questions

If you have any questions regarding this Privacy Notice, please contact us.