

Gridiron Partners

Privacy Notice

May 2019

Gridiron Partners (“Gridiron”) takes precautions to maintain the privacy of personal information concerning current and prospective clients. These precautions include the adoption of procedures designed to maintain and secure a client’s nonpublic personal information from inappropriate disclosure to third parties. Financial companies choose how they share your personal information. Federal law gives clients the right to limit some but not all sharing. Please read this notice carefully to understand how Gridiron handles client information.

Gridiron does not disclose nonpublic personal information about its clients to third parties other than as described below.

SOURCES OF INFORMATION

Gridiron may collect nonpublic personal information about you from the following sources:

- Information provided by a client or its representative in investment advisory contracts and related materials.
- Information obtained in connection with a client’s transactions – investments, withdrawals, etc.
- Information received from affiliates¹, nonaffiliates², or a consumer reporting agency (such as information obtained in connection with anti-money laundering, client identification and corresponding screening procedures).

INFORMATION COLLECTED

The type of information collected may include name, address, social security number, tax identification number, age, assets, income, bank account information, transaction history, investment objectives and experience, marital status, and other personal information.

HOW GRIDIRON USES THIS INFORMATION

All financial companies need to share client personal information to run their everyday business. Gridiron uses the information collected for everyday business purposes, which may include, for example:

- Providing advisory services to you;
- Opening an account for you;
- Processing a transaction for your account;
- Marketing products and services to you;
- Responding to court orders and legal investigations.

¹ Affiliates are companies related to Gridiron by common ownership or control and can include financial and nonfinancial companies.

² Nonaffiliates are companies not related to Gridiron by common ownership or control and can include both financial and nonfinancial companies.

DISCLOSURE OF INFORMATION

Gridiron does not disclose any nonpublic personal information about its clients except as permitted by law and as described in this notice. The Firm may disclose such information to unaffiliated service providers and financial institutions such as our administrator, auditors, prime brokers, and custodians that provide services to the Firm and its clients. The agreements entered into with such third-party service providers and financial institutions require such persons to protect the confidentiality of client's nonpublic personal information and to use such information solely for purposes for which it is disclosed to them.

These sharing practices are consistent with Federal privacy and related laws, and in general, clients may not limit the use of their personal information for these purposes under such laws. Privacy laws only give clients the right to limit the certain types of information sharing that Gridiron does not engage in (i.e. sharing certain information related to client transaction history or creditworthiness with affiliates for their use in marketing to you, or sharing any personal information with nonaffiliates for them to market to you). Gridiron may also release such nonpublic personal information about clients if they direct the Firm to do so, if Gridiron is compelled by law to do so, or in other legally limited circumstances (i.e. to protect a client account from fraud).

CONFIDENTIALITY AND SECURITY

Gridiron restricts access to client nonpublic personal information to employees and agents of the Firm and its respective service providers that need to know such information in order to provide services to clients. Gridiron maintains physical, electronic and procedural safeguards that comply with regulations to safeguard client's nonpublic personal information which the Firm believes are adequate to prevent unauthorized access of such information.

INQUIRIES

Any questions regarding this privacy notice should be directed to Mike Schneck at 724-759-7848.