

GRIDIRON PARTNERS, LLC

PRIVACY NOTICE

Effective Date: May 18, 2026

Why this notice

Federal law (the Gramm-Leach-Bliley Act and Regulation S-P, 17 CFR Section 248.30, as amended May 2024) requires investment advisers to give clients a notice describing how they collect, use, share, and protect personal information about them. This notice describes the privacy practices of Gridiron Partners, LLC (“Gridiron,” “we,” “our”), an investment adviser registered with the U.S. Securities and Exchange Commission.

This notice applies to current and prospective individual clients, and to natural persons associated with our institutional clients, whose nonpublic personal information we collect in connection with our advisory services. Please read it carefully and retain a copy for your records.

Information we collect

We collect nonpublic personal information about you from the following sources:

- Information you or your authorized representatives provide to us in advisory agreements, subscription documents, account-opening paperwork, questionnaires, and similar materials;
- Information generated by your transactions with us or through us, including holdings, contributions, withdrawals, and account activity;
- Information we receive from your custodian, broker-dealer, administrator, or other financial institution that maintains your account;
- Information we receive from affiliates, non-affiliates, and consumer reporting agencies in connection with anti-money-laundering, customer-identification, sanctions-screening, and similar regulatory checks.

The categories of nonpublic personal information we may collect include: name, residential and business address, telephone number, e-mail address, date of birth, Social Security or taxpayer identification number, government identification, citizenship status, employment and beneficial-ownership information, financial assets and liabilities, income, investment objectives and experience, marital and family status, bank-account and wire-routing information, transaction history, and other personal information you provide.

How we use your information

We use the nonpublic personal information we collect for ordinary business purposes connected to our advisory relationship with you, including:

- Providing investment advisory services and performing our obligations under our advisory agreement with you;
- Opening, administering, and servicing accounts at your custodian;

- Effecting, processing, and recording transactions for your account;
- Communicating with you about your account, our firm, and our services;
- Complying with applicable laws, regulations, and lawful requests from regulators, courts, and other governmental authorities; and
- Maintaining records required by the Investment Advisers Act of 1940 and other applicable laws.

How and with whom we share your information

Gridiron does not sell or rent your personal information. We do not disclose nonpublic personal information about current or former clients to third parties except as permitted by law and as described in this notice.

We may share your nonpublic personal information with:

- Custodians, broker-dealers, administrators, and other financial institutions that maintain your account, settle trades, or otherwise hold or service your assets;
- Service providers we engage to support our business, such as fund administrators, auditors, tax preparers, legal counsel, compliance consultants, technology and cybersecurity providers, and document-archiving and record-retention vendors, in each case subject to confidentiality obligations and our third-party risk-management program;
- Regulators (including the SEC), self-regulatory organizations, courts, and other governmental authorities in response to subpoenas, audit or examination requests, court orders, or as otherwise required by law;
- Other persons you authorize us to share information with, such as your attorney, accountant, financial planner, family office, or trustee.

Federal privacy law gives consumers the right to limit certain types of information-sharing for marketing purposes. Gridiron does not engage in those sharing practices: we do not share client transaction information with affiliates for their marketing use, and we do not share any personal information with non-affiliates for them to market their products or services to you. Because we do not engage in those practices, there is no opt-out election for you to make. If our practices change, we will update this notice and provide you with any opt-out election the law then requires.

How we protect your information

Gridiron maintains a written information security program, an incident response program, and a third-party risk-management program designed to meet the requirements of Regulation S-P Section 248.30, the SEC's safeguards and disposal rules, and applicable state laws. These programs are administered by the Chief Compliance Officer and reviewed at least annually.

Our administrative, technical, and physical safeguards include role-based access controls, multifactor authentication, encryption of data in transit and at rest where reasonably practicable, logging and monitoring of access to systems that hold customer information, vendor due diligence and ongoing oversight, employee training on privacy and information security, and secure destruction of records when retention obligations are satisfied. We assess our service providers' information-security practices at onboarding and on a recurring basis appropriate to the risk they present.

No system or program can eliminate all risk of unauthorized access. The safeguards described in this notice are intended to be reasonable measures, not guarantees.

How long we keep your information

We retain your nonpublic personal information for the period required by applicable law, including Rule 204-2 under the Investment Advisers Act of 1940 (generally not less than five years, the first two in an appropriate office of the adviser, and longer for certain categories of records), and our internal record-retention policy. When retention is no longer required, we dispose of records in a manner designed to prevent unauthorized access or use.

Former clients

If you are no longer a Gridiron client, we will continue to follow this Privacy Notice with respect to nonpublic personal information about you that we retain in our records.

Changes to this notice

We may amend this Privacy Notice from time to time. If we make material changes to our privacy practices, we will provide you with a revised notice. We deliver this notice to clients at the start of the advisory relationship, and we will provide a revised notice when our practices change in a manner that requires updated disclosure under applicable law.

Questions

If you have questions about this notice or about how Gridiron handles your information, please contact the Chief Compliance Officer:

Michael Schneck, Chief Compliance Officer

Gridiron Partners, LLC

Telephone: 724-759-7848

E-mail: mike@gridironpartners.com