

Kovitz Companies Privacy Policy

We recognize your concerns about the privacy of your nonpublic personal information. Because protecting your nonpublic personal information is very important to us, we have adopted the following policy regarding how the information you share with us is used and maintained. This privacy policy applies to current or former clients, customers, consumers and investors of Kovitz Investment Group, LLC, Kovitz Securities, LLC, New Millennium Fundamental Hedged Equity, L.P., New Millennium Fundamental Hedged Equity QP, L.P., and Anchor Capital Partners, L.P. (hereafter collectively referred to as the “Kovitz Companies”). The primary reason we collect, use and share nonpublic personal information is to offer financial products or services to you. We will not disclose any of your nonpublic personal information to anyone, except as permitted by law. **The Kovitz Companies do not sell or share personal information with non-affiliated companies for the purpose of marketing their products or services to you.**

Collection and Use of Personal Information. Nonpublic personal information means that information about you that we collect in connection with providing a financial product or service to you. Nonpublic personal information does not include information that is available from public sources, such as telephone directories or government records. We collect only relevant client and consumer information that we are either allowed or required by law to obtain for conducting our business. We collect nonpublic personal information from the following sources:

- Information we receive from you on account applications or other forms, such as name, address, Social Security number, assets, income and similar information. We use this information to administer your accounts, process transactions requested by you, provide financial products or customer services, evaluate your investment needs, and identify other products and services that may interest you.
- Information about your transactions with us, our affiliates or others, such as your account balance, payment history and check-writing activity. This information is used to process transactions that you request and evaluate your financial needs.
- If you use internet products and services such as a Kovitz Companies website, we may collect data, such as transaction, site navigation and optional survey information. We use this information to provide financial products and services to you.
- Information we receive from a consumer reporting agency, such as credit relationships and credit history, which is used to help us determine your eligibility for products, collect or report debts owed to us, and protect our rights and property.

Sharing of Information by the Kovitz Companies with its Affiliates. All or a portion of the nonpublic personal information collected through applications and forms and information relating to your transactions and experiences with us, together with other nonpublic personal information about you described above, may be shared among the Kovitz Companies and its affiliates.

Sharing of Information by the Kovitz Companies with Non-Affiliates. We may share nonpublic personal information about you with companies which are not affiliated with the Kovitz Companies to enable us to effect transactions for you or to provide financial products and services to you (collectively referred to herein as “Information Necessary to Serve Our Clients”). These nonaffiliated companies include our clearing firm, our IRA trustee, and other independent third party contractors which allow us to provide you with performance and transaction summary information or which perform administrative or marketing services on our behalf. We require these outside companies to protect the confidentiality of the nonpublic personal information we provide and to use this information only for the purpose for which the disclosure is made. Except for the foregoing, we will not disclose your nonpublic personal information to entities or individuals which are not affiliated with the Kovitz Companies unless one of the following conditions is met:

- We receive your prior written consent
- We believe the recipient to be you or your authorized representative
- We are required by law to release information to the recipient

Such non-affiliated companies may include:

- Companies that provide financial services, such as securities clearing firms, IRA trustees, banks, insurance companies, and other securities broker-dealers
- Nonfinancial companies, such as companies that perform services on our behalf, like check printers, companies that prepare account statements, and companies that assist us in marketing our services or communicating with you
- Others, such as independent contractors or technical-systems consultants who program our software, government agencies and regulators, consumer reporting agencies, and other outside parties as permitted or required by applicable laws

You may “opt out” or otherwise request that we do not provide nonpublic personal information (other than Information Necessary to Serve Our Clients) about you to entities or individuals which are not affiliated with the Kovitz Companies by notifying us of your request. Our toll free telephone number is 877-714-2327. You can also contact us by e-mail at mbrenner@kovitzinvestment.com.

Protecting the Confidentiality of Your Personal Information. All employees of the Kovitz Companies are instructed to use strict standards of care regarding the confidentiality of your nonpublic personal information as outlined in firm policies. We maintain physical, electronic, and procedural safeguards that comply with applicable laws to protect your nonpublic personal information, and restrict access to those employees who need access to provide financial products and services to you. Employees not adhering to our firm policies are subject to disciplinary action. We intend to verify that non-affiliated companies and independent contractors to whom we provide your nonpublic personal information implement procedures to protect the privacy of your nonpublic personal information or

otherwise enter into confidentiality agreements that restrict the use of the information to the intended purposes.

If we ever have reason to believe that your non-public information has been acquired by an unauthorized person, or that the security of your non-public information has been compromised, we will: investigate the nature of the incident, the client information involved and impacted, and any suspected loss. We will also notify the authorities, as appropriate. Most importantly, we will notify you and inform you as to what we will do to remedy the situation.

For further questions regarding our Privacy Policy please contact:

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