



MarshBerry Capital, Inc. Privacy Policy and Complaint Notification

MarshBerry Capital, Inc.'s ("MarshBerry Capital") relationship with you is based on trust, and protecting the privacy of your personal information is a high priority for us. "Non-Public Information" is information received by MarshBerry Capital that identifies you, your business entity, and any personal or business assets. The following policies apply to consumers who are present or former clients of MarshBerry Capital.

1. MarshBerry Capital collects personal and business information in order to provide a high level of service. MarshBerry Capital does not sell your information to anyone, under any circumstances.
2. Unless you have specifically authorized MarshBerry Capital to do so, MarshBerry Capital does not disclose your non-public information to others except in three limited circumstances.
 - ◆ MarshBerry Capital may from time to time share client information with our Parent company, Marsh, Berry & Company, Inc.
 - Due to the nature of our organization, MarshBerry Capital does share resources and office space with our Parent company and affiliated Registered Investment Advisor. While MarshBerry Capital has implemented procedures to limit your personal and business information to only those employees that need to know such information to provide you services, in the normal course of business, non-MarshBerry Capital employees may come into contact with your personal information.
 - The Parent company of MarshBerry Capital, Marsh, Berry & Company, Inc., provides non-securities related consulting services to customers in the same industry as clients of MarshBerry Capital, Inc. In relation to its Parent Company's consulting practice, MarshBerry Capital may provide certain financial and operational information, once a transaction has been completed, to our Parent company so they can aggregate the data with others in order to formulate various benchmarking statistics.

Please note, employees of the Parent company may unknowingly solicit MarshBerry Capital clients for other services. However, MarshBerry Capital typically does not pro-actively provide information to the Parent company related to its clients for purposes of contacting you regarding the Parent company's consulting services.

- ◆ MarshBerry Capital discloses non-public information to co-advisers, brokers and other agents that help us process your transactions, such as vendors providing administrative services, ESOP consulting services, marketing services, data processing or computer software maintenance and development. These co-advisers, brokers, and vendors or other agents, are required to sign a non-disclosure agreement agreeing to maintain the confidentiality of non-public information. These entities are required to have policies and procedures in place to protect your confidential information.



- ◆ MarshBerry Capital may also disclose non-public information if MarshBerry Capital believes in good faith that such disclosure is required to comply with applicable laws, such as cooperating with regulators, or to comply with court orders.

For example, in order to help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. So, when you begin a relationship with us, MarshBerry Capital will ask for name, address, date of birth, date of incorporation and/or other information that will allow us to identify you and/or your business. MarshBerry Capital may also ask to see your passport, driver's license, or other identifying documents.

3. MarshBerry Capital collects information from you using due diligence lists, verbal requests, or other means determined by you or MarshBerry Capital. The information we collect may include name, address, telephone and facsimile numbers, email addresses, and Social Security number or tax identification number, among other documents.
4. MarshBerry Capital internally safeguards your non-public information by restricting access to only those individuals associated with MarshBerry Capital that provide products or services to you or to those who need access to your information to service your transactions. In addition, MarshBerry Capital maintains physical, electronic and procedural safeguards that meet applicable legal standards to protect your non-public information. MarshBerry Capital does not share information with any affiliated entities, except in the limited instances noted above in Item #2, and unless necessary to do so in order to service your transaction.
5. If at any time in the future it is necessary for MarshBerry Capital to disclose any of your information in a manner inconsistent with this privacy policy statement, MarshBerry Capital will give you advance notice of the proposed change so that you will have any opportunity to "opt out" of such disclosure.

For more information-If you have questions about MarshBerry Capital's Privacy Policy please direct written correspondence to *28601 Chagrin Blvd., Suite 400, Woodmere, Ohio 44122*.

In the event you have a complaint, please direct written correspondence to the Compliance Department at, *28601 Chagrin Blvd., Suite 400, Woodmere, Ohio 44122*.

July 8, 2019