

## **APW Capital, Inc.**

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### **PRIVACY POLICY**

Pursuant to Regulation S-P adopted by the Securities and Exchange Commission, it is the policy of APW Capital, Inc. to keep confidential nonpublic personal information (“information”) pertaining to each current and former client (i.e., information and records pertaining to personal background, investment objectives, financial situation, investment holdings, account numbers, account balances, etc.) unless APW Capital, Inc. is:

1. Previously authorized by the client to disclose information to individuals and/or entities not affiliated with APW Capital, Inc., including, but not limited to the client’s other professional advisors and/or service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, etc.);
2. Required to do so by judicial or regulatory process; or
3. Otherwise permitted to do so by law.

The disclosure of information contained in any document completed by the client for processing and/or transmittal by APW Capital Inc. in order to facilitate the commencement/continuation/termination of business relationship between the client and a nonaffiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, insurance company, etc.), including information contained in any document completed and/or executed by the client for APW Capital, Inc., (i.e., Client agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider. Each individual and/or entity affiliated with APW Capital, Inc. is aware of APW Capital, Inc.’s, Privacy Policy, and has acknowledged his/her/its requirement to comply with same. In accordance with CAMAS’s Privacy Policy, each such affiliated individual and/or entity shall have access to information to the extent reasonably necessary for APW Capital Inc., to perform its services for the client, and to comply with applicable regulatory procedures and requirements.

Should you have any questions regarding the above, please contact our Compliance Department at (800)637-3211.