



THE MOORINGS GROUP

Custom fixed income portfolio management

THE MOORINGS GROUP, LLC PRIVACY POLICY

The Moorings Group values our client relationships and places a high priority on safeguarding confidential information with which we are entrusted. We are committed to protecting your privacy and maintaining your trust and confidence.

The Moorings Group collects information from you to assist us in providing services and products to help you meet your financial objectives and to enable us to provide high standards of client service. Additionally, information is obtained in order to help us fulfill our legal and regulatory requirements. Information collected may vary depending on the products and services rendered and the scope of your engagement with us.

Information Collected About You

The Moorings Group collects nonpublic personal information about you from the following sources:

- information provided on applications and related forms, such as name, address, telephone number, Social Security or Tax Identification number, birth date, net worth, annual income, information about your personal finances, and financial information such as bank and investment related accounts;
- information about your transactions with us, such as account balances, payment history, account numbers, and account activity.

Policies and Practices to Protect Your Personal Information

We maintain physical, electronic, and procedural safeguards to protect your personal information and train our staff to take caution in handling such personal information. In order to maintain confidentiality of your information, we restrict access to nonpublic information about you to staff that need to know such information in order to assist in providing products and services to you and those who assist in the administration of the office. Further, we limit staff access to information to only those who have a business or professional reason for knowing such information. Limited access is given to nonaffiliated third parties (as outlined below) in order to execute securities transactions on your behalf, or in order to provide account maintenance or customer service on your accounts.

Disclosure of Personal Information

As permitted by law, we may disclose personal information obtained from you, as described above, to financial service providers that service or provide support to your accounts, such as:

- securities broker/dealers;
- other investment advisers;
- investment companies;
- third-party administrators and vendors hired to effect, administer or enforce transactions or services in your accounts.

Additionally, we may be required by law or regulation to disclose information to third parties such as in response to a subpoena, to prevent fraud, to comply with rules and regulations to which we are subject, or in response to inquiries from industry regulators.

Other than the circumstances described above, we will not share your personal information with nonaffiliated third parties unless we have provided you with an updated Privacy Notice and provided you with an opportunity to approve or disapprove of the sharing of your information.

We will affirm our Privacy Policy in writing on an annual basis provided you maintain an ongoing relationship with us.