
VIGILANT Capital Management, LLC

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Privacy Notice

Online Privacy Policy

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Our Commitment to Protect your Privacy

This Online Privacy Policy (“Privacy Policy”) is provided by Vigilant Capital Management, LLC (“collectively Vigilant” “our,” “us,” “we”). This Privacy Policy is addressed to any current and/or prospective clients of Vigilant (“you”) whose personal information Vigilant collects and controls to conduct its business, including on our website (“Website”).

Legal Disclosure: Investing in securities involves risk of loss that clients should be prepared to bear. There can be no assurance that any specific investment will be suitable or profitable for a client’s investment portfolio. Past investment performance is not indicative of future results. The recipient of this material should not assume that any information presented herein serves as the receipt of, or a substitute for, personalized individual advice from Vigilant Capital Management, LLC (“Vigilant”). Vigilant’s specific advice to any client is given only within the context of its contractual agreements with each client. Nothing herein should be construed as a waiver or limitation of any rights that a client may have under applicable state or federal law. Additional information about Vigilant is available on the SEC’s website at www.adviserinfo.sec.gov.

www.vigilantcap.com

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This Privacy Policy describes how we collect, share, and protect your Personal Information and for what purpose. To the extent applicable, Personal Information in this Policy includes nonpublic information as well as the European Union’s definition of “personal data” as defined under the General Data Protection Regulation (the “GDPR”).

By visiting this Website, you are accepting the practices described in this Privacy Policy. If you do not agree to this policy, please do not use this Website.

Changes to this Privacy Policy

This Privacy Policy may change from time to time and should be reviewed periodically. Such changes shall be effective immediately upon posting. The current version of this Privacy Policy can be accessed from the link on the bottom of our homepage, or at the bottom of our other Website pages. By accessing our Website after we have posted changes to this Privacy Policy, you are agreeing to the terms of the Privacy Policy as modified.

Categories of Personal Information We Collect

When you establish a relationship with us, you are requested to furnish personal and financial information to assist in assessing your financial objectives and goals. The information you share with us is private and confidential, and we are committed to protecting your privacy. In addition to the information we collect directly from you (whether personally, in writing, by telephone, or otherwise), during the course of our relationship we may also collect a variety of nonpublic personal information from other sources. For example, we may collect transactional information or other types of personal information about you from third parties such as accountants, legal counsel, financial advisors, insurance agents, banking institutions, brokerage firms and others in connection to providing you with our services.

We collect and share (as necessary) specific types of personal information in order to provide you with comprehensive financial planning and investment advisory services. This information can include:

- personal information such as name, telephone, address, date of birth, social security number, government identification, and marital status;
- digital footprint data such as e-mail;
- biographical data such as age and gender;
- employment data such as salary information, job position, and tax information;
- financial information such as bank information, credit card numbers, transaction information, and pension.

What Personal Information Do We Collect When You Visit Our Website?

When you visit our Website, we collect information from you when you register or fill out a form, if applicable. We are the sole owners of the information collected on this Website. We will not sell or share this information with anyone unless otherwise specified. As of the date of this policy, our Website does not collect any cookies or respond to Do Not Track Signals.

For more information please see, “Do We Use “Cookies” or Collect Other Personal Information When You Visit Our Website?”

VIGILANT Capital Management, LLC

Our Use of Information

We collect and use nonpublic personal information about you for the purpose of providing our financial planning and investment advisory services requested by you or persons authorized by you. In managing your investment for you, we will use your personal information to:

- monitor, audit, evaluate and otherwise administer our services;
- provide continuous service to you and to conduct business processing functions including by providing personal information to our contractors, service providers, or other third parties;
- communicate with you and respond to your inquiries;
- in an effort to prevent and protect against fraud and identify theft;
- in an effort to prevent copyright infringement, unauthorized use and distribution of protected content and other unlawful activity, claims and liabilities;
- pursue our legitimate interests;
- conduct investigations and comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies and terms; and/or
- for other purposes required or authorized by law, including other purposes for which you have provided your consent.

In the event that we use personal information we collect for other purposes not identified above where direct client consent is required under applicable rules, laws and/or regulations we will provide specific notice at the time we collect such personal information.

Information We May Disclose to Third Parties

All financial companies need to share clients' personal information to run their everyday business. We do not disclose any nonpublic personal information about you to third parties, except under the following circumstances: as authorized by you, as required or permitted by law, and for our everyday business purposes. For example, we may disclose nonpublic personal information necessary to effectuate a transaction on your behalf, to service your investment account, to conduct wealth planning services, or to comply with legal requirements.

We outsource certain functions, technology and otherwise, to various nonaffiliated third-party vendors. In order for these vendors to perform the services for which they have been contracted, nonpublic, personal client information may be disclosed to or hosted on the third-party vendor's technology.

While our contractual arrangements with third-party vendors generally require that the third party execute a signed non-disclosure agreement and/or otherwise ensure that they will keep such information confidential, consistent with the conduct of our business relationship, third-party vendors could experience information-security breaches or other incidents that could expose nonpublic personal information of our clients. The occurrence of such an incident experienced by a third-party vendor is outside of our control.

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Vigilant does not share personal information with third parties so they can market to you.

It is our policy to limit employee access to nonpublic personal information only to those employees who have a business or professional reason for knowing it. Vigilant limits access to nonaffiliated third parties as permitted by law.

Disclosure of any personal information about our former clients is handled in the same manner as for our current clients.

In the section below pursuant to U.S. Federal Laws, we list the reasons financial companies can share their clients' personal information; the reasons Vigilant chooses to share; and whether you can limit this sharing.

Reasons we can share your Personal Information	Does Vigilant share?	Can you limit sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations	Yes	No
For our marketing purposes — to offer our services to you	No	N/A
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes — information about your transactions and experiences	N/A	N/A
For our affiliates' everyday business purposes	N/A	N/A
For our affiliates to market to you	N/A	N/A
For nonaffiliates to market to you	No	We don't share

Limits on Sharing

To the extent U.S. Federal laws apply to your personal information, you have the right to limit only:

- sharing for affiliates' everyday business purposes;
- affiliates from using your information to market to you; and
- sharing for nonaffiliates to market to you.

U.S. state laws and individual companies may give you additional rights to limit sharing.

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Lawful Basis for Processing

Vigilant may have one or more of the following lawful bases to process your personal information:

- Consent: your freely, informed, and voluntary consent to process your personal information in connection to our investment services.
- Contract: processing your personal information is necessary in order to fulfill a contract.
- Legal Obligation: processing is necessary to comply with applicable rules, laws, and regulations.
- Legitimate Interests: processing is necessary to the legitimate interests of our firm and/or a third party.

Individual Rights

To the extent permitted by the applicable law of your jurisdiction, in relation to your personal information, you may request:

- to have your personal information corrected, for example, if it is incomplete or incorrect;
- to opt out of receiving marketing communications at any time;
- the right to file a complaint with an applicable government regulator such as a Data Protection Authority.

In addition to the foregoing, if you are located in the European Economic Area (“EEA”), to the extent permitted by applicable law, in relation to your personal information, you may request:

- to access the personal information held by us about you;
- the right to restrict or object to the processing of your personal information, or request that your personal information is erased;
- the right to receive a copy of the personal information which you have provided to our firm, in a structured, commonly used and machine-readable format (known as “data portability”);
- have a copy of the personal information we hold about you provided to you or another controller where technically feasible;
- where you have provided personal information voluntarily, or otherwise consented to its use, the right to withdraw your consent.

To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to your information.

To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain.

VIGILANT Capital Management, LLC

Will your Personal Information be kept Accurate, Complete and Up to Date?

We will endeavor to ensure your personal information is kept accurate, complete, up to date and relevant. Please let us know if any of your details change. If you feel your personal information is not accurate, complete or up to date, please notify us and we will take reasonable steps to ensure it is corrected. You can contact us using the details listed below.

How We Protect Information

Vigilant maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients' nonpublic personal information ("information"). Through this policy and its underlying procedures, Vigilant attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

As our Website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

Links to Third-Party Websites. As a convenience to you, Vigilant may provide hyperlinks to websites operated by third parties. When you select these hyperlinks, you will be leaving our Website.

Vigilant has no control over third party websites, their content, or security. Accordingly, when you access these third-party websites it is at your own risk. We encourage you to read the associated privacy policies by such third-party websites to learn more about their data privacy management practices. Vigilant may, in its sole discretion, block links to our Website and Content without prior notice.

Retention and Processing of Personal Information

To the extent permitted by applicable law, we retain your personal information for the period necessary to serve the purposes for which we obtained it. We may also retain your personal information beyond such period in accordance with applicable laws, regulations, or another lawful basis, including but not limited to, compliance with our contractual obligations, legal obligations, regulatory obligations, legal claims, or another legitimate interest.

Do We Use "Cookies" or Collect Other Personal Information When You Visit Our Website?

As of the date of this policy, our Website does not use "cookies."

How do We Respond to Do Not Track Signals?

We do not track users across time or over multiple Websites, we do not receive, or respond to, browser do-not-track signals or other similar mechanisms. However, as noted above, some third-party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you.

Amending your internet browser's Do Not Track signal: Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers and is a way for users to inform Websites and services that they do not

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want certain information about their webpage visits collected over time and across Websites or online services.

To learn more about setting up a Do Not Track signal, please visit <https://allaboutdnt.com/>.

For more information on how our firm responds to Do Not Track signals, please refer to the Appendix attached to this policy.

Information About Children

The Site is not directed to children under the age of 18 years. By using our Site, you represent and warrant that you are at least 18 years old.

If you are a parent or guardian and believe we may have collected information about a child under the age of 18, please contact us as described below so we can take reasonable steps to remove that information from our servers.

Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

Data Transfers

We may transfer the personal information we obtain about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. To the extent required by applicable law, when we transfer your information to recipients in other countries (such as the United States, United Kingdom, Ireland or Cayman Islands), we will protect that information as described in this Online Privacy Policy.

If you are located in the European Economic Area ("EEA"), we will comply with applicable legal requirements regarding the provision of appropriate safeguards for the transfer of personal information to recipients in countries for which the European Commission has not issued an adequacy decision.

Data Controller

As identified under applicable law, the data controller for this Website is Vigilant, located at the address below.

Whom can you Contact at Vigilant?

If you have any questions regarding this Privacy Policy or would like to exercise your rights, you may contact our Chief Compliance Officer using the information below:

*Attention: Lawrence Blaisdell, Chief Compliance Officer
Vigilant Capital Management, LLC
One Monument Square, Suite 601
Portland, ME 04101*

VIGILANT Capital Management, LLC

Phone: (207) 523-1110

E-mail: lblaisdell@vigilantcap.com

Web: www.vigilantcap.com

Definitions

Affiliates: Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Vigilant does not have any affiliate companies.

Nonaffiliates: Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- Vigilant does not share with nonaffiliates so they can market to you.

Joint Marketing: A formal agreement between nonaffiliated financial companies that together market financial services to you.

- Vigilant does not jointly market.