

PRIVACY POLICY

Information We Collect

You may provide STUDIO Investment Management, LLC (“STUDIO”), which does business as STUDIO Investment Management, Gantzert Investment Company, and Vezzetti Investment, with information, directly or indirectly, that is inherently private and personal in nature (i.e., “nonpublic personal information”). STUDIO is committed to safeguarding such information and maintaining its confidential nature, disclosing it only as needed to provide you services, or as permitted by law. For example, STUDIO may collect such nonpublic personal information about you from the following sources:

- 1) Information received from you in written agreements, applications, or other documents and forms;
- 2) Information received from you verbally in the regular course of providing services to you; and
- 3) Information gathered from your assets or transactions with STUDIO or others.

This information may include, but is not limited to, your name, address, email address, Social Security Number, driver’s license data, passport data, date of birth, employment data, and marital status. We may also collect information through your use of our website, including IP addresses and device identifiers.

How We Safeguard Your Information

STUDIO implements the following procedural, physical, and electronic safeguards for the protection of your information:

- 1) STUDIO restricts access to nonpublic personal information to those employees who need the information in order for STUDIO to provide its services to you;
- 2) STUDIO secures hard copies of nonpublic personal information from unauthorized persons by shredding unnecessary documents and by securing its physical office at each close of business;
- 3) STUDIO protects electronic data containing nonpublic personal information from unauthorized persons through password protection, firewall security, and other technology-security measures; and
- 4) STUDIO takes care to avoid unauthorized persons from overhearing or intercepting conversations involving nonpublic personal information.

Information We Disclose

STUDIO may disclose nonpublic personal information to the following types of unaffiliated third parties:

- 1) Outside entities or persons that use the information to help STUDIO provide its services to you. Such entities may include Charles Schwab, Envestnet Tamarac, eMoney, Holistiplan, Microsoft, Global Relay, or others;
- 2) Regulatory authorities or law enforcement entities that have jurisdiction over STUDIO, but only as required by U.S. or other applicable laws, regulations, or rules;
- 3) Outside entities that may assist STUDIO in the prevention of fraud; and
- 4) Other outside entities or persons, such as mortgage lenders, accountants, attorneys, and insurance agents, but only with your authorization.

If you have any questions regarding STUDIO’s Privacy Policy or its policies and procedures, please contact Mike Wolcott, STUDIO’s Managing Principal and Chief Compliance Officer, at 312.399.0828 or mwolcott@studioinvestment.com.