

The Norden Group LLC Privacy Policy Notice

The Norden Group LLC has adopted this privacy policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information. We provide this notice to you initially and on an annual basis as required by applicable law, and we will provide a revised notice if we make material changes to our privacy practices.

Information We Collect: We collect certain nonpublic information about you ("Customer Information"). The essential purpose for collecting Customer Information is to allow us to provide advisory services to you. Customer Information we collect may include:

- Information that you provide on applications or other forms. This Customer Information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account, and other records concerning your financial condition and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Identifying information such as your name, age, address, social security number, etc.
- Information about your transactions with us, or others (e.g., broker-dealers, clearing firms, or other chosen investment sponsors).
- Information we receive from consumer reporting agencies (e.g., credit bureaus), as well as other various materials we may use to provide an appropriate recommendation or to fill a service request.
- The categories above are examples and may vary depending on the services you request and the products you use.

Security of Your Information: We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information. We also maintain written policies and procedures designed to protect customer information, including cybersecurity and incident response measures, and we oversee service providers that may have access to such information, consistent with applicable law.

Information We Disclose: We do not disclose the nonpublic personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the authorized services (such as broker-dealers, custodians, independent managers etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, consultants, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law;

The categories of nonpublic personal information that may be disclosed (as applicable) include identifiers (e.g., name, address, Social Security number), account and relationship information, transaction information, and advisory profile information.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are required to keep such information confidential and use it only for the purpose for which it is provided, consistent with applicable law and contractual obligations. We do not share nonpublic

information with affiliates because we do not have affiliates.

Opt-Out Right: If we share your nonpublic personal information with nonaffiliated third parties other than as permitted by law, you have the right to opt out of that sharing. To opt out, contact us at hello@thenordengroup.com or mail your request to: 5255 N. Edgewood Drive Suite 225 Provo, UT 84604.

Please include your name and sufficient information for us to identify your account. We will process your request in a timely manner.

Former Clients: If you decide to close your account(s) or become an inactive customer, we will continue to protect your nonpublic personal information in accordance with this notice and applicable law.

Changes to Our Privacy Policy: In the event there were to be a material change to our privacy policy regarding how we use your confidential information, we will provide written notice to you.

Questions: If you have questions about this privacy notice or about the privacy of your customer information call our main number 801-331-5511 and ask to speak to the Chief Compliance Officer.