



## AZIMUT INVESTMENT ADVISORS PRIVACY POLICY NOTICE

Effective date: January 31, 2026

Azimut Investment Advisors LLC (“AIA”, “we”, “us”, “our”) is an investment adviser registered with the U.S. Securities and Exchange Commission and the State of Florida. We provide investment advisory services to individuals, trusts, corporations and retirement plans. This Privacy Notice explains how we collect, use and share your personal information, how we protect it, and what choices you have. It applies to current and former clients and to prospective clients whose information we receive in connection with our services.

### 1. What information we collect and where it comes from

We collect personal information we need to open and service your accounts, provide investment advice and comply with legal and regulatory requirements. This includes:

- **Identification data** – name, postal and email address, telephone number, date of birth, taxpayer identification numbers, passport or other government IDs.
- **Financial data** – account numbers, balances and holdings, transaction history, income, assets and liabilities, net worth, investment objectives, time horizon and risk tolerance.
- **Employment and professional data** – employer, occupation or position and relevant business or compensation details.
- **Limited demographic data** – marital status and dependents, where relevant for financial planning or suitability.

We obtain this information mainly from you (for example through account and know-your-customer forms, advisory agreements, questionnaires and our ongoing communications by email, telephone, video conference or in person). We may also receive information from custodians, executing brokers, administrators, transfer agents, banks and other financial institutions that hold or process your accounts; from public registries and websites used to verify identity and perform compliance checks; and from third-party screening or background providers used for anti-money-laundering, sanctions and similar regulatory purposes.

We do not intentionally collect health information, political opinions, religious beliefs or other highly sensitive categories of data in the ordinary course of our business. If you provide such information incidentally, we treat it with the same level of care and protection as other personal information.

## 2. How we use your information

We use your personal information to:

- provide investment advisory and related services, including opening, maintaining and servicing your accounts, designing investment strategies, providing portfolio management and financial planning and communicating with you about your accounts;
- execute and monitor investments, including placing trades, reconciling positions and cash and working with custodians and other service providers;
- manage our relationship with you, including preparing reports and invoices, responding to your requests and maintaining our business records;
- comply with legal and regulatory obligations, including those of financial regulators and tax authorities, and to perform anti-money-laundering, sanctions, fraud prevention and other compliance checks; and
- support our internal operations, improve services, monitor quality and enhance security.

We may also use your information to send limited marketing and informational communications, such as newsletters, market commentary and event invitations related to our services. You may ask us at any time not to receive certain marketing or informational communications.

We **do not sell** your personal information.

## 3. How we share your information

We share your personal information only as needed to operate our business, provide services to you and comply with law. We may share information with:

- custodians and executing brokers;
- administrators, transfer agents and other fund service providers;
- sub-advisers and model providers;
- independent auditors, legal counsel and other professional advisers.
- IT and operational service providers (for example, providers of cloud hosting, portfolio and reporting systems, customer relationship management tools, email and document storage and client portals);
- marketing and communications platforms we use to send newsletters, event invitations and similar communications on our behalf; and
- regulators, tax authorities and law-enforcement agencies, as required or permitted by law.

We share only the information reasonably necessary for the recipient to perform its function or comply with applicable law. We do **not** share your personal information with non-affiliated companies so they can market their own products or services to you, and we do not have corporate affiliates that receive your information for their own marketing purposes.

## 4. International transfers, security and retention

Our primary systems and servers are located in the United States. If you are a client located in another country, your personal information will be processed in the United States and, where necessary, may be accessed by service providers in other countries. Where required by applicable law, we take appropriate

steps to ensure that cross-border transfers occur in compliance with those laws, which may include contractual protections or other safeguards.

We maintain policies and procedures designed to protect your personal information from unauthorized access, use or disclosure. These include administrative safeguards (policies, procedures and staff training), technical safeguards (access controls, authentication measures and other IT security controls) and physical safeguards (secured offices and controlled access to systems and files). We require our service providers who receive personal information to protect it appropriately and to use it only for the purposes for which it is disclosed.

We retain personal information for as long as necessary to provide services to you and to meet our legal, regulatory and record-keeping obligations. We may keep your records for a period of years after your relationship with us ends, in line with applicable requirements. After the relevant retention period, information is securely destroyed or anonymized.

## 5. Your choices, cookies, contact and changes

You may contact us at any time to ask questions about how we handle your personal information or to ask us not to send certain marketing or informational communications (for example, by following unsubscribe instructions in those communications or by contacting us directly). Because we do not share your personal information with non-affiliated companies so they can market to you, there is no separate “opt-out” needed for that type of sharing. If we change our sharing practices in a way that requires an opt-out right, we will notify you in advance and provide a method for you to exercise that choice.

If you visit our website or use any online portals we provide, we may collect limited technical and usage information (such as IP address, browser type and pages visited) through cookies or similar technologies. We use this information to operate and secure the website or portal, understand how visitors use our site and improve content and functionality. We do not use cookies or similar technologies to profile you for targeted advertising. Depending on your browser settings, you may be able to refuse cookies or receive a warning when a cookie is placed, though this may affect some website features.

If you have any questions about this Privacy Notice, how we handle personal information or if you wish to exercise your rights, please contact us at:

- **Mail:** Azimut Investment Advisors, 1450 Brickell Ave. Suite 2610, Miami, FL 33131
- **Email:** [rodrigo.rego@azimutgenesis.com](mailto:rodrigo.rego@azimutgenesis.com)
- **Telephone:** +1 (786) 866-3700

We may update this Privacy Notice from time to time to reflect changes in our practices, legal requirements or other factors. When we do, we will revise the “Effective date” at the top of this Notice and provide it to you as required by applicable law. The most current version may also be made available on request and, if applicable, on our website or client portal.