

Term	
Ivy Capital LLC d/b/a 'Ivy & Co.'	Ivy Capital LLC d/b/a 'Ivy & Co.' (the 'Firm').
Overview	
In accordance with general business practice, this document outlines / informs the public on the firm's policies and non-exhaustive operational relationship to non-public information (NPI).	
Terms Defined	
Confidential Information	Personally identifiable private information, not available from public sources, about a client or consumer. It generally includes name, address, age, social security number, assets, income, net-worth, account balances, account numbers, beneficiary information, or investment history.
Consumer	A person who has not entered into an investment advisory relationship but has disclosed nonpublic personal information to our firm.
Client	A person who has entered into an investment advisory relationship with the firm or that individual's designated representative.
Information We Collect	Information We Disclose
In connection with providing financial advice, or other advisory services, we obtain non-public personal information about you, including: <ul style="list-style-type: none"> Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income Information about your transactions with us, our affiliates, or others. 	We may only disclose information that we collect in accordance with this policy. The Firm does not sell customer lists and will not sell your name to telemarketers.
Parties to Whom We Disclose	
We will not disclose information regarding you or your account at The Firm, except under the following circumstances: <ul style="list-style-type: none"> Service providers who assist in managing your accounts, such as custodians, investment companies, insurance providers, or other financial institutions that have a legitimate and necessary need to access NPI. Vetted technology partners or administrative vendors who support account servicing, client relationship management, or secure communications. Your designated representatives, such as your attorney, accountant, or trustee, when authorized by you. Our firm's professional support team, including attorneys, accountants, and auditors. 	
How We Use Information	
Information may be used among companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants and programmers, or companies that help us market products and services to you, such as: <ul style="list-style-type: none"> Processing transactions and service requests at your direction Protecting your information from unauthorized access or fraud Coordinating services with custodians or other unaffiliated providers involved in managing your account Keeping you informed of services or updates relevant to your financial goals Complying with federal and state regulatory requirements 	
Security Policy:	
We restrict access to nonpublic personal information about you to individuals who need to know that information to provide products or services to you and to perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information. Internal policies and procedures are in place to address cyber security.	

Use of Affiliated Information

A registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. The Firm does not receive information regarding marketing eligibility from affiliates to make solicitations.

Disclosure of Non-Public Personal Information

We maintain strict confidentiality standards and safeguard your data in accordance with both state and federal regulations. In the normal course of servicing your accounts and fulfilling our regulatory obligations, we may share limited non-public personal information with non-affiliated third parties such as custodians, attorneys, auditors, or technology providers acting on our behalf. These disclosures are made solely to facilitate the ongoing care, administration, and regulatory oversight of your accounts and our firm. We carefully vet and engage only partners who maintain appropriate data protection safeguards.

As part of providing advisory services, the Firm shares relevant non-public personal information with accountants, attorneys, trustees, and other stakeholders involved in a client’s financial affairs, solely to facilitate coordinated planning, account administration, and regulatory compliance. We do not sell or share your information for marketing purposes.

Permitted Disclosures

In accordance with applicable privacy regulations, the Firm may disclose non-public personal information without additional client authorization in the following circumstances:

- To resolve client disputes or respond to inquiries.
- To individuals or entities with a legal or beneficial interest related to the client.
- To individuals acting in a fiduciary or representative capacity on behalf of the client.
- To regulatory, compliance, or industry bodies assessing our firm’s practices, as well as to our legal, tax, and audit professionals.
- In connection with a sale, merger, or reorganization of the firm.
- In response to examinations, investigations, or legal requests from regulatory or law enforcement authorities.
- For operational functions that involve secure messaging or communication services that may process limited client data.

Closed or Inactive Accounts:

In the event of account termination and or termination of client firm - relationship, NPI and other privacy policies contained herein will continue to be honored.

Changes to This Privacy Policy:

The firm will, on a best efforts basis; notify parties whom are subject or have been subject to this agreement, when material changes and / or amendments are made.

Complaint Notification:

Please direct complaints to:	931 Main Street, Suite #3, South Glastonbury, CT, 06073	(860) 734-4024	comply@ivywm.com
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