



# Seven Hills Capital Corp.

## Privacy Policy and Procedures

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives the customer the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

### TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect non-public personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information, Financial Account Numbers and/or Balances, Sources of Income, and Credit Card Numbers or Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

### PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisers may need to share personal information to run their everyday business. In the section below, we list the reasons that we may share your personal information:

- For everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus;
- For our marketing – to offer our products and services to you;
- For joint marketing with other financial companies;
- For our affiliates everyday business purposes – information about your transactions and experiences and information about your creditworthiness; or
- For non-affiliates to market to you. If you are a new customer we may begin sharing your information on the day you sign our agreement. When you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

### PROTECTING CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

### FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING – OPTING OUT

Federal law allows you the right to limit the sharing of your NPI by “opting-out” of the following: sharing for affiliates; everyday business purposes – information about your creditworthiness; or sharing with affiliates or non- affiliates who use your information to market to you. State laws and individual

companies may give you additional rights to limit sharing. Please notify us immediately if you choose to opt out of these types of sharing.

### SHARING CLIENT INFORMATION WITH THIRD PARTIES

When Seven Hills Capital enters into arrangements with service providers to store, handle or process client information on behalf of Seven Hills Capital, such as for data processing and document storage software support, such parties will be required to provide comparable privacy protection while the information is processed or handled by them. Specifically, the service providers will be required to certify they have sufficient controls to safeguard and retain client information for the time periods requested by Seven Hills Capital and that such information can be accessed by Seven Hills Capital within reasonable time periods. This may be included in contractual terms or evidenced by audited reports on controls.

In all other cases Seven Hills Capital will only provide information to third parties if it has authorization to do so or where legislation requires. Seven Hills Capital will not make personal information available in any manner to third parties for unauthorized purposes such as advertising or other solicitation.

### INFORMATION WE COLLECT

We may collect and process the following data about you:

#### Personal Identification Information

- Name
- Email address
- Phone number
- Address
- Company name

#### Non-Personal Identification Information

- Browser type
- Operating system
- Internet Protocol (IP) address
- Internet Service Provider (ISP)
- Date and time of visit
- Pages visited

### HOW WE COLLECT YOUR INFORMATION

We collect information from you in several ways:

#### Directly from You

- When you fill out forms on our website
- When you subscribe to our newsletter
- When you contact us via email or phone

#### Automatically

- Through cookies and tracking technologies
- When you navigate through our site

## HOW WE USE YOUR INFORMATION

We use the information we collect in the following ways:

- To provide, operate, and maintain our website and services
- To improve our website and services
- To understand and analyze how you use our website
- To develop new products, services, features, and functionality
- To communicate with you, including customer service, updates, and promotional offers
- To process your transactions and send related information
- To prevent fraudulent transactions, monitor against theft, and protect our customers and our business

## SHARING YOUR INFORMATION

We may share your information with:

- Third-party service providers that perform services on our behalf, such as payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance
- Our affiliates, in which case we will require those affiliates to honor this Privacy Policy
- Law enforcement, government officials, or other third parties when we are compelled to do so by law or subpoena
- Other business entities, should we plan to merge with or be acquired by that business entity

## COOKIES AND TRACKING TECHNOLOGIES

We use cookies and similar tracking technologies to track the activity on our website and hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. Security of Your Information. We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse.

## YOUR DATA PROTECTION RIGHTS

Depending on your location, you may have the following rights regarding your personal information:

- The right to access – You have the right to request copies of your personal data.

**DEFINITIONS:** Affiliates – companies related by common ownership or control. They can be financial and non-financial companies; non-affiliates – companies not related by common ownership or control. They can be financial and non-financial companies; Joint marketing – a formal agreement between non-affiliates financial companies that together market financial products or services to you.

***Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.***