

WHAT DOES TRILOGY CAPITAL, INC. DO WITH YOUR PERSONAL INFORMATION?

As a Registered Investment Adviser (“RIA”), we must share some of your personal information to service your account. Federal and State laws give you the right to limit certain types of sharing and require us to disclose how we collect, share, and protect your personal information.

INFORMATION WE COULD COLLECT FROM YOU

Driver’s License Number
Social Security or taxpayer identification Number
Name, address, phone number[s] and E-mail address[es]
Account information (including other institutions)
Date of Birth
Assets and liabilities
Income and Expenses
Investment activity, Investment experience and goals

INFORMATION WE COULD COLLECT FROM OTHER SOURCES

Custody, brokerage and advisory agreements
Other advisory agreements and legal documents
Transactional information with us or others
Account applications and forms
Investment questionnaires and suitability documents
Other information needed to service account

HOW WE PROTECT YOUR INFORMATION

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural, and electronic security measures, including secure passwords, encrypted file storage, and a secure office environment. Our technology vendors implement security controls and access restrictions and have policies governing data transmission. Additionally, our associates receive training on their responsibilities to protect client information. We also require third parties that assist in providing our services to uphold strict data protection standards.

HOW WE SHARE YOUR INFORMATION

As an RIA, we share your personal information as needed to effectively provide our services. Below, we outline some of the reasons we may share your personal information and whether you can limit this sharing.

Reasons we can share your personal information	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	YES	NO
Marketing Purposes Trilogy does not share your personal information with non-affiliated third parties for marketing purposes. We may use your information for our own marketing efforts however we only share your information with third parties as necessary to service your account. Certain laws may permit us to share your personal information with financial institutions where you are a customer and where Trilogy or you have a formal agreement with the institution. Any such sharing is strictly for servicing your account, not for marketing purposes.	NO	YES
Authorized Users Your non-public personal information may be disclosed to you and persons that are your authorized agent[s] or representative[s].	YES	YES
Information About Former Clients Trilogy does not disclose and does not intend to disclose, non-public personal information, including mobile information, to non-affiliated third parties with respect to persons who are no longer our Clients.	NO	NO

STATE-SPECIFIC REGULATIONS

California	In response to California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
Massachusetts	In response to Massachusetts law, the Client must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. Client opt-in is obtained through the Client’s execution of authorization forms provided by the third parties, by executing an Information Sharing Authorization Form, or by other written consent by the Client, as appropriate and consistent with applicable laws and regulations.
Vermont	In response to a Vermont regulation, if we disclose personal information about you to non-affiliated third parties, we will only disclose your name, address, other contract information, and general information about our experience with you.

CHANGES TO OUR PRIVACY POLICY

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the sharing of information.

ANY QUESTIONS?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at marketing@trilogyfs.com or (844) 356-4934 ext. 1160.