

Santiago Capital, LLC

Privacy Policy

Our Commitment to Santiago Capital, LLC (“Santiago” or the “Advisor”) is committed to safeguarding the personal information of our clients, prospective clients, and other persons we interact with in the normal course of business (also referred to as “you” and “your”), as described here in our Privacy Policy (“Policy”).

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

We understand you have entrusted us with your private information, and we do everything that we can to maintain that trust. Santiago (also referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure such information is used solely for proper business purposes in connection with the management or servicing of our relationship with you. We will not sell your non-public personal information to anyone, and we will not provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Why you need to know?

Registered Investment Advisers (“RIAs”) must share some of your personal information in the course of managing their relationship with you and/or servicing your account. Federal and state laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social Security or taxpayer identification number	Assets and liabilities
Name, address, and phone number(s)	Income and expenses
E-mail address(es)	Investment experience and goals
Account information (including other institutions)	

What information do we collect from other sources?

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

How do 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 by maintaining a secure office environment. Our technology vendors provide security and access control over personal information and adhere to strict policies over the transmission of data. Our associates are trained on their responsibilities to protect clients' personal information. In all instances, we require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares its clients' personal information as necessary in the course of effectively implementing its services. In the section below, we list some instances that may require us to share your personal information.

Basis for Sharing	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: Santiago does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Santiago or a client has a formal agreement with the financial institution. However, we will only share information for	No	Not Shared

Basis for Sharing	Do we share?	Can you limit?
purpose of servicing your account(s), and under no circumstances will we do so for marketing purposes.		
Authorized Users: Your non-public personal information may be disclosed to persons who we believe are acting in the capacity of your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients: Santiago does not disclose and does not intend to disclose non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.	No	Not Shared

Changes to our Privacy Policy

We send a copy of this Policy to our clients as updates occur, as long as a client maintains an ongoing relationship with us.

Periodically, we may revise this Policy and will provide our clients 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 our clients and provide each client with an opportunity to prevent the information sharing.

Non-clients may request a copy of our Privacy Policy by contacting us at brent@santiagocapital.com

Any Questions?

You may ask questions, voice any concerns, and/or obtain a copy of our current Privacy Policy by contacting us at **415-699-8972**.