

Five Dimensions Investment Management, LLC 330 5<sup>th</sup> Avenue Indialantic, Florida 32903 1-321-593-1555 www.fivedimensionsinvest.com

## Privacy Policy

## Our commitment to you.

As a client of Five Dimensions Investment Management, you've entrusted to our care not only your financial assets but certain personal and financial data as well. We recognize that your relationship with us is based on trust and that you expect us to act responsibly and in your best interests. Because your personal and financial data is your private information, we hold ourselves to the highest standards in its safekeeping and use. Five Dimensions Investment Management may serve as the investment advisor or subadvisor to an investment company registered under the Investment Company Act of 1940 (each, a "Fund"), and as such maintains shareholder information for each Fund under management. It is the policy of Five Dimensions Investment to adopt each Fund Privacy Policy, which shall be incorporated by reference into this Policy.

We collect nonpublic personal information about our clients from information we receive from your applications or other forms relating to establishing an account with us. In addition, we obtain information in connection with executing transactions on your behalf and dealing with your custodian.

All information regarding client identity, security holdings and financial status will be kept strictly confidential. We maintain physical, electronic and operational safeguards to protect nonpublic personal information about our clients.

We do not disclose any of your nonpublic personal information unless

- (1) you request or authorize it,
- (2) we have been advised that your accountant, attorney, or consultant is requesting the information on your behalf, or
- (3) we are legally required to provide the information to a governmental agency.

We sometimes find it necessary to provide personal information about you to entities that provide a service on behalf of Five Dimensions Investment Management, such as firms that provide reports or custody Form ADV – Part 2A – Disclosure Brochure

## Five Dimensions Investment Management LLC

services on behalf of our clients. These companies are expected to maintain strict privacy and confidentiality policies.

If you have any questions about our privacy policies or our commitment to you to safeguard private information, please contact us at 321-593-1555.

## Five Dimensions U.S. Small Cap Strategy Privacy Notice

The Five Dimensions U.S. Small Cap Strategy collects non-public information about you from the following sources:

- Information we receive about you on applications or other forms;
- Information you give us orally; and
- Information about your transactions with us or others.

We do not disclose any non-public personal information about our shareholders or former shareholders without the shareholder's authorization, except as permitted by law or in response to inquiries from governmental authorities. We may share information with affiliated and unaffiliated third parties with whom we have contracts for servicing the Five Dimensions U.S. Small Cap Strategy. We will provide unaffiliated third parties with only the information necessary to carry out their assigned responsibilities. We maintain physical, electronic and procedural safeguards to guard your non-public personal information and require third parties to treat your non-public personal information with the same high degree of confidentiality.

In the event that you are invested in the strategy through a financial intermediary, including, but not limited to, an advisor, a broker-dealer, bank, or trust company, the privacy policy of your financial intermediary would govern how your non-public personal information would be shared by those entities with unaffiliated third parties