

Item 1 PRIVACY POLICY NOTICE

Blue Water Asset Management Privacy Policy Notice February 11, 2025

Blue Water Asset Management has adopted this privacy policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information.

Information We Collect: We collect certain nonpublic information about you ("Customer Information"). The essential purpose for collecting Customer Information is to allow us to provide advisory services to you. Customer Information we collect may include:

- Information that you provide on applications or other forms. This Customer Information may include personal and household information such as income, spending habits, investment objectives, financial goals, statements of account, and other records concerning your financial condition and assets, together with information concerning employee benefits and retirement plan interests, wills, trusts, mortgages and tax returns.
- Identifying information such as your name, age, address, social security number, etc.
- Information about your transactions with us, or others (e.g. broker/dealers, clearing firms, or other chosen investment sponsors).
- Information we receive from consumer reporting agencies (e.g. credit bureaus), as well as other various materials we may use to provide an appropriate recommendation or to fill a service request.

Security of Your Information: We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

Information We Disclose: We do not disclose the nonpublic personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, broker-dealer firms having regulatory requirements to supervise certain Blue Water Asset Management activities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law. Customers may not limit sharing for these purposes.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative services on our behalf). These third parties are prohibited from using or sharing the information for any other purpose. However, mobile information specifically will not be shared with third parties/affiliates for marketing/promotional purposes. All the above (or below) categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties. If you decide at some point to either terminate our services or become an inactive customer, we will

continue to adhere to our privacy policy, as may be amended from time to time.

Former Clients: If you decide to close your account(s) or become an inactive customer, we will adhere to our privacy policies, which may be amended from time to time.

Text Messaging: Mobile information will not be shared with third parties/affiliates for marketing/promotional purposes. The descriptions of how we use information elsewhere in this privacy policy exclude the information you provide as part of your consent to receive text messages from us; this information will not be shared with any third parties and will only be used to document your consent to receive text messages, to send those text messages to you, and to comply with any applicable laws and regulations.

We use text messaging to communicate only with individuals who have indicated to us that they consider text an acceptable form of communication.

When you let us know that text messages are an acceptable form of communication for you, you are expressly authorizing us to contact you at the phone number you used to consent to text communications, and you are agreeing that we may communicate with you by text message in accordance with these terms and privacy policy. You can consent to receive text messages from us by:

- Sending us a text that requests a response
- Telling us to text you
- Completing an advisory agreement that states you consent to text messages

Even after you consent to receiving text messages, you may opt out of such communications at any time by sending STOP to the phone number that you no longer want to send you text messages.

Changes to Our Privacy Policy: Except as required or permitted by law, we do not share confidential information about you with non-affiliated third parties. In the unlikely event there were to be a change in this fundamental policy that would permit or require additional disclosures of your confidential information, we will provide written notice to you, and you will be given an opportunity to direct us as to whether such disclosure is acceptable.

Your Rights:

- Right to Access Information/Correct Inaccurate Information
 - You have the right to request access to information collected about you and information regarding the purposes for which we collect it and the third parties and service providers with which we share it. Additionally, you have the right to correct inaccurate or incomplete information. You may submit such a request as described below.
- Right to Deletion of Information
 - You have the right to request in certain circumstances that we delete any information that we have collected directly from you. You may submit such a request as described below. We may have a reason under the law why we do not have to comply with your request or why we may comply in a more limited way than you anticipated. If we do, we will explain that to you in our response.
- Right to Opt Out of Sale of Information to Third Parties
 - You have the right to opt out of any sale of your information by us to third parties by submitting a request. We do not, however, sell information to third parties for their own direct marketing purposes.
- Right to Opt Out of Targeted Advertising
 - You have the right to opt out of [targeted advertising](#) based on your information obtained from your activities over time and across websites or applications. We do not, however,

- utilize targeted advertising.
- Right to Opt Out of Profiling
 - You have the right to opt out of having your information processed for the purpose of profiling in the furtherance of decisions that produce legal or similarly significant effects concerning you. We do not, however, utilize profiling for these reasons.
- Right to Appeal
 - If we decline to take action in any request that you submit in connection with the rights described in the above sections, you may ask that we reconsider our response by sending an email to the same email box (referenced in section below) from which you receive the decision. You must ask us to reconsider our decision within 45 days after we send you our decision.

Questions: If you have questions about this privacy notice or have a question about the privacy of your customer information call our main number 616-447-1600 and ask to speak to the Chief Compliance Officer.