

## **PRIVACY POLICY NOTICE**

Palo Capital, Inc. takes very seriously its obligation to protect our clients' privacy.

In the regular conduct of our business, Palo Capital acquires nonpublic, personal information from sources such as the information reported by you on applications or other forms you provide to us, and information about your transactions with us and with other firms involved in delivering the services we provide to you.

We share nonpublic information solely to service our client accounts; otherwise, we do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. We do not sell information about any current or former customers.

As illustrations of the information sharing required for servicing your account, we share information with the custodian for your accounts and with the firm which produces reports which measure the investment performance of your account.

Information safeguarding. Internally, Palo Capital safeguards your nonpublic personal information by restricting access to only those employees who either provide products or services to you, or who need access to your information to service your account. In addition, we will maintain physical, electronic and procedural safeguards that meet federal and/or state standards to guard your nonpublic personal information.