



## **Privacy Policy**

Castle Rock Investment Company takes the privacy and security of individuals and their personal information very seriously and takes every reasonable measure and precaution to protect and secure the personal data provided to us. This policy explains how the personal information collected from clients, or otherwise received about clients, is handled.

Personal identifiable information collected may include a client's name, address, email address, phone number, assets, age, social security number, income, net worth, account balance, account number, beneficiary designations and investment activity. Personal information received from clients is used strictly for conducting our business and is relevant for the services provided.

We do not sell, trade, or otherwise transfer personal information to outside parties but may release information to government agencies or authorized third parties when required by law or to provide the services requested. For example, we may be required to share such information in response to subpoenas or to comply with certain laws. Also, as necessary, client information may be shared to complete transactions, make account changes or service their account (for example, communications with a client's accountant).

Records relating to professional services are retained as required by law and to comply with professional guidelines. We have robust information security policies and procedures in place to protect personal information from unauthorized access, alteration, disclosure or destruction. In order to protect the nonpublic personal information collected, we maintain physical, electronic, and procedural safeguards that comply with applicable law.

We understand that continuous employee awareness and understanding is vital and have implemented an employee cyber security policy as part of our induction and annual training program. Access to personal information is restricted to those employees of that need collected information to provide services to participants. Employees who deal with personal information are trained to adhere to strict confidentiality standards and any employee who violates these standards will be subject to strict disciplinary action.

Our data breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time. Our procedures are robust and have been disseminated to all employees, making them aware of the reporting lines and steps to follow. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities.

If you have any questions, or need assistance in any way, please do not hesitate to contact the President and Information Security Officer of Castle Rock Investment Company, Michele L. Suriano, at (303) 725-7086 or by email at [Msuriano@CastleRockInvesting.com](mailto:Msuriano@CastleRockInvesting.com).