



SIERRA CAPITAL

FOUNDED 1998

Annual Privacy Notice

Sierra Capital LLC (the “firm”) strives to maintain the highest standard of confidentiality and to respect the privacy of the firm’s clients. In accordance with regulations, the firm is providing this Annual Privacy Notice to all clients who receive financial advice and services provided by the firm.

This Privacy Notice sets forth the Firm’s policies with respect to nonpublic personal client information.

Information the firm collects about clients

The firm collects nonpublic personal information about clients primarily from the information the firm receives in the investment management agreement, Investment policy statement, or other forms, submitted to the firm. The firm may also collect information from a client’s transactions with the firm and/or its affiliates.

Disclosure Policy

The firm does not disclose any nonpublic personal information about its clients or former clients to anyone other than to its affiliates, and except as permitted by law, such as information that the firm provides to brokers, bankers, outside accountants and attorneys in order to service the client.

Except as described above, the firm will not disclose nonpublic personal client information to non-affiliated parties, unless a client has been given notice of the possibility of such disclosure and opportunity to “opt-out” of the disclosure (Omit this)

Information Safeguarding Policy

The firm restricts access to nonpublic personal information about clients to those employees and service providers who utilize the information to enable the firm to provide services to the clients. The firm uses security measures that comply with federal law. The firm maintains physical, electronic and procedural safeguards to guard investor’s nonpublic information.

Please contact the firm with any questions or comments regarding this policy or any related matter.