Helianth Investment Management, LLC
Privacy-Confidentiality Policy & Privacy Notice

Helianth Investment Management (HIM or Firm) values the trust and confidence you place in us, and we consider your information and the transactions we conduct on your behalf important. We consider client privacy to be fundamental to our relationship with clients. Accordingly, we have committed to maintaining the confidentiality, integrity, and security of clients' personal information. It is therefore our policy to respect the privacy of current and former clients and to protect confidential and personal information entrusted to us.

In the course of providing products and services, we collect non-public personal information about clients. We collect this information from sources such as account applications, other account forms, transactions made, and from other information you provide to us.

Our policy is to keep your information confidential and safeguarded. We will use this information only to provide investment advisory services to you as outlined in our contract, or as required by our regulatory agencies. We will not sell information about your account to anyone. We will not use your specific account information for marketing our firm and/or affiliates without your prior approval.

We do not disclose non-public personal information to non-affiliated parties, except as allowed by applicable law or regulation. In the normal course of serving clients, information we collect may be shared with companies that perform various services on your behalf such as transfer agents, custodians, or broker-dealers. The organizations that receive client information will use that information only for the services required and as allowed by applicable law or regulation, and are not permitted to share or use this information for any other purpose.

We have internal control procedures in place to protect the security of your information. These procedures include confidentiality agreements with our professional service providers (i.e. certified public accounting firm, information systems consultant, etc.), password protected user access to our computer files and secured storage for client files. We maintain physical, electronic and procedural safeguards to ensure our adherence to professional standards.

Access to clients' non-public personal information is restricted to Firm employees who need to access that information to provide products or services to clients.

To guard clients' non-public personal information, physical, electronic, and procedural safeguards are in place that comply with federal standards. A client's right to privacy and confidentiality extends to all forms of contact with us, including telephone, written correspondence, and electronic media, such as the Internet. We will adhere to the policies and practices above for both current and former clients.

For questions about our policy, or for additional copies of this notice, please contact us at bob@helianthinvestment.com or 203-302-3979.

Exhibit A

Privacy & Confidentiality Policy/Procedures

HIM will take reasonable steps to ensure that the Firm and its staff safeguard the private, confidential and non-public personal information and business/organizational information, as the case may be, regarding its clients, including the following:

- Firm (and its employees) will not, except as permitted under Regulation S-P and any other applicable SEC regulations and rules, disclose to any person or entity non-public personally identifiable information about its individual retail and high-net-worth (HNW) clients.

- Firm will ensure that documents containing confidential and non-public personal and business/organizational information are safeguarded away from other clients of HIM and third parties and, where disposed of, will be handled through appropriate destruction and disposal methods.

- No Firm staff will share any client information with anyone outside HIM, except: (a) with an executing broker-dealer or custodian appointed by the client; or (b) with the express written authorization or permission of the client.

FACTS — WHAT DOES HELIANTH INVESTMENT MANAGEMENT, LLC (HIM) DO WITH YOUR PERSONAL INFORMATION?

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: ■ Social Security number and Income ■ Assets and Net Worth ■ Investment Accounts and Account Balances
How?	All financial companies need to share Client's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their Client's personal information; the reasons HIM chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does HIM share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	YES
For our marketing purposes— to offer our products and services to you	YES	YES
For joint marketing with other financial companies	NO	N/A
For our affiliates' everyday business purposes— information about your transactions and experiences	NO	N/A
For our affiliates' everyday business purposes— information about your creditworthiness	NO	N/A
For nonaffiliates to market to you	NO	N/A

To limit our sharing	■ Call 203-302-3979 **or** ■ Contact us in writing by email: **Bob@helianthinvestment.com** **Please note:** If you are a *new* customer, we can begin sharing your information **3-5** days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.
Questions?	Call 203-302-3979 or **Contact us in writing as noted above**

Who we are	
Who is providing this notice?	HELIANTH INVESTMENT MANAGEMENT LLC (HIM)

What we do	
How does HIM protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does HIM collect my personal information?	We collect your personal information, for example, when you ■ open an account or ■ or ■
Why can't I limit all sharing?	Federal law gives you the right to limit only ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account—unless you tell us otherwise.

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. ■ *NONE*
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. ■ *Brokerage Firms and Account Custodians*
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. ■ *NONE*

Other important information