



PRIVACY NOTICE

If you are not going to read the document, at least read this: We may disclose your Information with government agencies and regulators, as in the course of regulatory review. Outside of these exceptions, we do not share your Information with non-affiliated third parties. If your relationship with us ends or becomes inactive, we continue to treat your Information that we have collected in accordance with this Privacy Notice.

Investment Management Associates, Inc. (“we”) respects the privacy of our client relationships and is committed to maintaining the highest standards of confidentiality. In that regard, we are providing this Privacy Notice to all of our clients who obtain financial products and services from us in accordance with Title V of the Gramm-Leach-Bliley Act of 1999 and its implementing regulations.

Collection and Use of Your Personal Information

We collect and use non-public personal information (“Information”) such as name, address, birth date, social security number, assets, account transactions and income. This Information comes primarily from account applications, financial statements or other forms you or your agent submits to us. We also receive your Information through oral, written or electronic communication. We use this information to administer your accounts, process transactions, and provide services to your accounts.

Sharing of Your Information

In the normal course of business, we may share your Information with parties that represent you, such as custodians, financial consultants or other non-affiliated third parties at your consent or direction. Non-affiliated third-party disclosure may also include companies under contract with us to perform services for us or on our behalf, such as vendors providing data processing or computer software maintenance.

We restrict access to your Information to only those employees who need to know that information to provide our financial services to you. We maintain physical, electronic, and procedural safeguards that comply with federal, and certain state standards to guard your Information from unauthorized disclosure. Our employees, when working with your Information,

must protect the integrity and the confidential nature of your Information. Our employees are bound by our Code of Ethics and other policies to access customer information only for legitimate business purposes and to keep your Information confidential.

Updating the Privacy Policy

Under the Fixing America's Surface Transportation Act (the "FAST" Act), investment advisers are not required to send annual Privacy Notices to prospective and current clients if the adviser (i) only shares nonpublic personal information with nonaffiliated third-parties in a manner that does not require an opt-out right be provided to customers; and (ii) has not changed its policies and procedures with regard to disclosing nonpublic personal information since it last provided a Privacy Notice to clients.

As required by Regulation S-P, IMA provides an initial Privacy Notice to clients (or to their financial intermediaries) who establishes an advisory relationship with us. IMA will not provide annual privacy notices unless there has been a change to its privacy policies and practices since the notice was last provided to clients. In the future, if it is necessary to disclose your Information that is not consistent with this policy, we will provide you with advance notice of the proposed change so that you will have the opportunity to opt out of such disclosure.

If you have questions or require further information, please contact us at 303-796-8333.