

## **Privacy Policy – Our Commitment to You**

We treat your non-public personal financial information with confidentiality and respect. Our Privacy Policy defines the trust, privacy, and confidentiality we have with our clients. Our Privacy Policy is reasonably designed to:

1. Ensure the security and confidentiality of your records and information.
2. Protect against anticipated threats or hazards to the security or integrity of your records and information; and,
3. Protect against unauthorized access to or use of your records or information that could result in substantial harm or inconvenience to you.

## **Information We Collect About You**

You typically provide personal information when you open an account with us. This information includes financial and tax identification information, to comply with U.S. government laws and rules, as well as rules imposed by regulatory organizations and jurisdictions. We request personal information from new clients as well as from clients who have had long-standing relationships with us. Your advisor must have a reasonable basis for believing that the recommendation is suitable for you. In making this assessment, your advisor must consider your risk tolerance, other security holdings, financial situation (income and net worth), financial needs and investment objectives.

## **Responsibility to Protect Non-Public Personal Information**

Our Supervised Persons are accountable for protecting confidential client information in which they have access. We restrict access to your non-public personal information to those persons on a need-to-know basis.

Non-public personal information includes all information you provide to obtain a financial product or service. It also includes information resulting from any transaction or information otherwise obtained in providing a financial product or services. In addition, we maintain physical, procedural and electronic safeguards to protect the information from access by unauthorized parties.

## **Sharing Information**

We do not sell lists of client information. We do not disclose client information to marketing companies unless we hire them to provide specific services as listed below. We do not disclose any non-public personal information except as provided by law. We may share non-public personal information with our affiliates while processing transactions, managing accounts on your behalf, or to inform you of products or services that we believe may be of interest to you.

Additionally, we may share non-public personal information with the following types of third parties: (a) our financial service providers, such as custodians, transfer agents and third-party money managers; (b) non-financial companies under servicing or joint marketing agreements, such as printing firms, mailing firms, or providing service firms data transfer information for the purpose of aggregation, or performance reports; (c) With broker-dealer firms having regulatory requirements to supervise certain aspects of the firm's activities.

These third parties are bound by law or by contract to use your information only for the services for which we hired them and are not permitted to use or share this information for any other purpose. Your non-public personal information may also be disclosed to persons we believe to be your authorized agent or representative. We are also required to disclose your information to various regulatory agencies in order to satisfy our regulatory obligations and as otherwise required or permitted by law. In addition, we will disclose client information to third-party litigants when we are required to do so by lawful judicial process or by court order. We may also disclose your confidential information in response to a request from a government authority that has jurisdiction over our affairs.

## **Former Customers**

We do not disclose any non-public personal information about our former clients to anyone, except as required by law.

## **Keeping You Informed**

We will send you a copy of our Privacy Notice annually for as long as you maintain a relationship with us. We will provide you with a revised policy if we make any material changes.

**FACTS****WHAT DOES STONE CREEK CAPITAL MANAGEMENT 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
- account numbers and income tax information
- date of birth and credit scores

When you are *no longer* our customer, we continue to share your information as described in this notice

**How?**

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Stone Creek Capital Management chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Stone Creek share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations.	<b>Yes</b>	<b>No</b>
<b>For our marketing purposes—</b> to offer our products and services to you	<b>Yes</b>	<b>Yes</b>
<b>For joint marketing with other financial companies</b>	<b>No</b>	<b>We do not share</b>
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	<b>Yes</b>	<b>Yes</b>
<b>For our non-affiliates' everyday business purposes—</b> information about your creditworthiness	<b>No</b>	<b>We do not share</b>
<b>For our affiliates to market to you</b>	<b>Yes</b>	<b>Yes</b>
<b>For non-affiliates to market to you</b> If your advisor terminates his or her relationship with us and moves to another investment advisory firm, we or your advisor may disclose your personal information to the new firm.	<b>Yes</b>	<b>Yes</b>

**To limit our sharing**

**If you would like to limit the information your advisor could share if he or she were to terminate with us and move to another investment advisory firm, please return the Privacy Opt-Out form attached to this notice.**

If you are a *new* customer, we can begin sharing your information 30 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.

Who we are	
Who is providing this notice?	Stone Creek Capital Management
What we do	
How does Stone Creek 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 Stone Creek collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ open an account</li> <li>■ Provide account information</li> <li>■ Give us your contact information</li> <li>■ Enter an investment or advisory services contract</li> <li>■ Tell us about your investments or retirement portfolio</li> <li>■ seek investment advice</li> <li>■ apply for insurance</li> <li>■ place transactions with us</li> </ul>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. [See below for more on your rights under state law.]</p>
Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Stone Creek Capital Management, LLC ("Stone Creek") is under common ownership with Merit Financial Group, LLC, which is also an SEC registered investment adviser.</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Nonaffiliates we may share information with include the custodian or broker-dealers that maintain custody of your funds and securities.</i></li> <li>■ <i>May include your advisor's new investment advisory firm</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <p><i>Our joint marketing partners include financial institutions such as a custodian or broker dealer.</i></p>
Other important information	
<p>Information for California, Massachusetts, North Dakota, and Vermont Customers</p> <p>In response to applicable state law, if the mailing address provided for your account is in California, Massachusetts, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.</p>	
<b>Questions?</b>	Call (678) 867-7050 or go to <a href="http://stonecreekmarginlending.com">stonecreekmarginlending.com</a>

**Privacy Opt-Out Form**

To opt out of all of the above types of sharing, you can contact us at any time. If you would like to limit the personal information that your financial advisor could disclose or take upon termination of their relationship with Stone Creek and transfer to another investment advisory firm, please complete and mail the following form to:

Stone Creek Capital Management, LLC  
2400 Lakeview Parkway, Suite 550  
Alpharetta, GA 30009

Or email a scanned copy of this form to [compliance@stonecreekcapmgt.com](mailto:compliance@stonecreekcapmgt.com)

You may withdraw your opt-out choice at any time by contacting us in writing at the mailing or email addresses provided above.

If your primary address is in a state that requires your positive consent to share your personal information with a new firm, then you must give your written consent before we will allow your financial advisor to take any of your personal information to that new firm.

By completing and returning this form as described, I am instructing Stone Creek Capital Management to limit the personal information about me that my financial advisor could disclose or take if she or he terminates with Stone Creek Capital Management and moves to another investment advisory firm.

Please note that for accounts held jointly by two or more persons, the opt-out election made by any account holder applies to all joint holders with respect to the account. In order for your opt-out election to be effective, you must complete ALL of the following information:

Name (please print clearly): \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State/Zip: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Name of financial advisor at Stone Creek: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_