

Finch Capital Management LLC

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Privacy Policy

Finch Capital Management LLC (“FCM”) is an investment advisory firm registered with the state of Texas and provides investment advisory services and operates www.finchcap.com, which describes our services.

This document is intended to inform prospective clients and website visitors of our policies concerning the collection, use, sharing, and disclosure of Personal Information of anyone using our services.

By using our services, you agree to the collection and use of information by the terms of this policy. The Personal Information collected by the firm is used to assist FCM in providing investment advisory services. The firm will not use or share your information with anyone except as described in this Privacy Policy.

When you are no longer our client, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, which is accessible at www.finchcap.com unless otherwise defined in this Privacy Policy.

FCM deploys appropriate computer safeguards and secures all files and buildings to protect your personal information from unauthorized access and use.

Information Collection and Use

FCM may require you to provide the firm with certain personally identifiable information, including, but not limited to, your name, phone number, and postal address. This information is used to contact or identify you.

For business purposes— such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations, the firm may collect, track, and share Social Security numbers, Tax ID’s, income, account balances, and credit information.

The federal government and some states allow you to limit this collection and sharing. Such limits may prevent our providing necessary services. For more information or to limit information sharing, contact us at the phone number or email address listed below for more information.

Log Data

When you visit our company website, the firm will collect information that your browser sends to us called Log Data. This Log Data may include information such as your computer’s Internet Protocol (IP) address, browser version, pages of our Service that you visit, the time and date of your visit, the time spent on those pages, and other statistics.

Cookies

Cookies are files with a small amount of data that are commonly used as a unique, anonymous identifier. These are sent to your browser from the website you visit and stored on your computer’s hard drive.

FCM's website uses these "cookies" to collect information and to improve our Service. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your computer. If you choose to refuse these cookies, you may not be able to use some portions of the firm's website services.

Third-Parties

FCM may share information with third-party companies and individuals due to the following reasons:

- To facilitate our investment advisory services;
- To provide the investment advisory services on our behalf;
- To perform operational-related services; or
- To assist us in analyzing how our investment advisory services are used.
- Pursuant to law, rules, regulations, standard security industry practices, in connection with a subpoena, discovery request, or other legal/regulatory process compelling the sharing of information.

These third parties will have access to your Personal Information to perform the tasks assigned to them on our behalf. They are not allowed to disclose or use the information for any other purpose.

Links to Other Sites

Our website may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that site. FCM strongly advises you to review the Privacy Policy of these websites, as we have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Changes to This Privacy Policy

FCM may update our Privacy Policy at any time, and we advise you to review the website periodically for any changes. The firm will notify you of any changes by posting the new Privacy Policy on the website. All changes are effective immediately after they are posted on the web page.

Contact Us

If you have any questions or suggestions about our Privacy Policy, please feel free to contact us by phone at 737-301-2121 or by email at taylor@finchcap.com.