

FACTS

WHAT DOES OPTIMA ASSET MANAGEMENT INC. DO WITH YOUR PERSONAL INFORMATION?

Why?	Registered Investment Advisers choose how they share your personal information. Federal law gives clients 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?	<p>The types of personal information we collect, and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none">▪ Information you provide in the subscription documents and other forms (including name, address, social security number, date of birth, income and other financial-related information); and▪ Data about your transactions with us (such as the types of investments you have made and your account status).
How?	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Optima Asset Management, Inc. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information
<p>For our everyday business purposes— to process your transactions, maintain your accounts (for example we may share with our third-party service providers that perform services on our behalf or on your behalf, such as accountants, attorneys, consultants, clearing and custodial firms, and technology companies, respond to court orders and legal investigations, or report to credit bureaus.</p>
<p>For Marketing purposes— to offer our products and services to you</p>

How do we protect your information?
<p>To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.</p>
<p>Our employees are advised about Optima Asset Management's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.</p>
<p>We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements.</p>

Other important information
<p>We will send you our Privacy Notice annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our Privacy Notice and will provide you with a revised policy if the changes materially alter the previous Privacy Notice. We will not, however, revise our Privacy Notice to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.</p>