



PRIVACY NOTICE

Our Privacy Commitment to You

Consultiva Internacional, Inc. (Consultiva) recognizes the importance of safeguarding the personal information of our customers. Therefore, it is the policy of Consultiva that customer information must be protected in accordance with all applicable laws and regulations. We share a commitment to protect your privacy and the confidentiality of your personal and financial information.

Collection of Information

As providers of services that involve compiling personal—and sometimes, sensitive—information, protecting the confidentiality of that information has been, and will continue to be a top priority throughout Consultiva. We believe that you should know about the information we collect, the measures we take to safeguard it, and the situations in which we might share the information with select business partners. This brochure explains how Consultiva handles-and protects- personal information.

Consultiva must collect certain information in order to provide customer service, evaluate benefits, and fulfill legal and regulatory requirements. Specific examples may not apply to all customers, and the information we collect varies accordingly. Examples include:

- Information on your advisory agreement and related forms, such as name, address, date of birth, social security number, gender, marital status, assets, income, and investment option elections;
- Information about your relationship with us, such as services agreed upon, account balances, and payment history.

Sharing and Use of Information:

We may share the information described for business purposes with affiliated and non-affiliated financial institutions such as mutual fund companies, insurance companies and/or clearing brokers. We will share personal information with affiliated and non-affiliated companies only when they agree to uphold and maintain our privacy standards when handling a customer's personal information. Also, we may disclose personal information with affiliated and non-affiliated companies and regulatory authorities as permitted by applicable law. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies and as necessary to protect our rights or property. Except as described in this privacy policy, we will not use your personal information for any other purpose.

Maintaining Accurate Information

We continually strive to maintain complete and accurate information about you and your accounts. If you ever believe that our records contain inaccurate or incomplete information about you, please let us know immediately. We will correct any inaccuracies as quickly as possible.

Protecting the Information

We are committed to maintain the security of our customers' personal information. To ensure such information is used only in the manner we have described in this policy, we have instituted the following safeguards;

- Employees are required to comply with our privacy policies and procedures, which exist to protect the confidentiality of customer information. Any employee who violates our privacy policy will be subject to a disciplinary process.
- Employees access the information only on a business need-to-know basis, such as administration procedures and customer services requested.
- We use manual and electronic security procedures to maintain the confidentiality of the information we collect and to guard against its unauthorized access. Such methods include locked files, user files, user authentication, encryption and firewall technology.

Procedures to Opt Out

Clients may opt out of Consultiva's sharing certain nonpublic personal information with affiliate and/or non-affiliated third parties by notifying us in writing to: Attn: Chief Compliance Officer, Consultiva Internacional, Inc., 48 Carr. 165 Ste. 801, Guaynabo PR 00968-8045. Please note that, even if you direct us not to share this information, we may still have to disclose your nonpublic information as permitted by law and/or to provide the investment advisory services, for example, to monitor/supervise your portfolio.

How You Can Help Protect Your Privacy

- Do not divulge your account information, passwords or code words with others.
- Do not provide confidential information by telephone to unknown callers.
- Do not submit confidential information online, unless you initiated the contact, know the entity or person with whom you are dealing, and provide the information through a secure channel.
- When conducting business over the internet, always use a secure browser and exit online applications as soon as you finish using them.
- If you believe you are a victim of fraud or identity theft, please contact your Investment Advisor for assistance who will take steps to ensure that your account is put on hold to prohibit any and all transactions.
- Contact your Social Security Administration's Fraud Hotline at 1-800-269-0271 to report fraudulent use of your identification information.
- Report the incident as quickly as possible to the credit reporting agencies:
 - Experian: 1-888-397-3742 or www.experian.com
 - Equifax: 1-800-685-1111 or www.equifax.com
 - TransUnion: 1-800-916-8800 or www.transunion.com
- File a police report in your local jurisdiction and retain the port number and the name of the officer who took the report.
- File a complaint with the Federal Trade Commission (FTC) by contacting the FTC's Identity Theft Hotline: 1-877-438-4338.