



FINANCIAL NAVIGATORS, INC.

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PRIVACY POLICY

Introduction

Financial Navigators, Inc. takes measures to ensure that the use and disclosure of your private personal information are consistent with applicable law.

Our Consumer Information Privacy Policy ("Privacy Policy") explains what nonpublic personal information we collect, why we collect it, how we protect this information, and how and why, in some instances, we share such information among third parties such as accountants, lawyers, insurance agents, real estate agents, banking institutions and other advisors. We may amend our Privacy Policy from time to time. Our Privacy Policy applies to nonpublic personal information collected or used when offering services to individuals for personal, family, or household purposes. This disclosure is on behalf of Financial Navigators, Inc.

Our Privacy Policy applies to individual investors (both current and former investors) who have a direct relationship with Financial Navigators, Inc. If you own investment products or receive services in the name of a third-party broker-dealer, investment adviser, or other financial service providers, that third party's privacy policies may apply to you.

Information That We Collect and May Disclose with Your Authorization

We collect information from and about you to provide the superior level of service that you expect. Nonpublic personal information about you may include: your name, mailing address, e-mail address, tax identification number, age, account information, investment amounts in our company, marital status, number of dependents, assets, debts, income, net worth, employment history, financial statements, beneficiary information, personal bank account information, credit history information, broker-dealer, financial advisor, IRA custodian, account joint owners and other similar parties, the investment products and services you purchase, your account balance or transactional history, the fact that you are or have been an investor in a sponsored investment and particulars related to any such investment.

Specific examples of personal information that we may collect and may disclose to certain third parties with your authorization include:

- Information we receive from you on applications or other forms. Examples include your name, mailing address, and e-mail address.
- Information about your transactions with us and others such as account balances, payment history, account activity, and financial statements.
- Information obtained from others, such as credit reports from consumer credit reporting agencies.

How We Use and Disclose Information

The responsible use and disclosure of the nonpublic personal information we collect is crucial to our ability to provide our clients with the type of services they expect and may occur under a variety of different circumstances. For example, we may:

- Use your personally identifiable information internally, which may include analyzing your data, processing services, maintaining accounts, resolving disputes, preventing fraud, and verifying your identity.
- Disclose your personally identifiable information when required by law, such as requests for personal data connected with a judicial, administrative, or investigative matter.

Sharing Among other Service Providers

We may share your personally identifiable information among other related financial service activities. Examples might include customer-initiated service requests, establishing and managing your investor accounts, completing your investor transactions, and sharing information with authorized parties acting at your request and on your behalf, such as your broker-dealer, financial advisor, joint owners, an IRA custodian.

Sharing with Nonaffiliated Service Providers

We do not disclose your personal information to nonaffiliated service providers.

How We Protect Your Information

Financial Navigators, Inc. maintains a comprehensive information security program designed to ensure customer information security and confidentiality, protect against threats or hazards of such information, and prevent unauthorized access. This program includes:

- Procedures and specifications for administrative, technical, and physical safeguards.
- Security procedures related to the processing, storage, retention, and disposal of confidential information.
- Programs to detect, prevent and when necessary respond to attacks, intrusions, or unauthorized access to personal information.
- Restricting access to customer information to employees who need to know that information to provide services to you and appointing specific employees to oversee our information security program.

Availability of Our Privacy Policy

We will provide notice of our Privacy Policy annually if you maintain an ongoing relationship with us. The most up-to-date Privacy Policy is posted on our Website.

Notification of Changes to Our Privacy Policy

If we decide to change our Privacy Policy, we will post those changes on the Website. If at any point we decide to use or disclose your personally identifiable information in a manner different from that stated at the time it was collected, we will notify you in writing. We will otherwise use and disclose personally identifiable information per the Privacy Policy that was in effect when we collected such data.

Change in Control

Suppose Financial Navigators, Inc. experiences a "change in control" (defined below). In that case, we may amend our information practices as described in this Privacy Policy. We will disclose your personally identifiable information to the company or other legal entity that succeeds the company subject to the change in control or the Website's operation. The succeeding legal entity's Privacy Policy will then govern the personally identifiable information that Financial Navigators, Inc. had collected from you under this Privacy Policy. However, suppose applicable law prohibits the succeeding legal entity's privacy policy from governing your personally identifiable information. In that case, this Privacy Policy shall continue to govern. "Change in control" means any of the following events:

- A reorganization, merger, acquisition, or other restructuring involving all or substantially all Financial Navigator, by operation of law or otherwise.
- Insolvency.
- A general assignment for the benefit of creditors.
- The appointment of a receiver.
- The filing of a bankruptcy or insolvency proceeding.
- The liquidation of assets.

Questions about Our Privacy Policy

If you have any questions about our Privacy Policy or our Website's information practices, please contact us at info@financialnav.com.

Application of Privacy Policy to the Company

This Privacy Policy applies to Financial Navigators, Inc. and all other funds or entities created in the future that offer investment products or services to individuals for personal, family, or household purposes.