



## **Empiric Institutional Privacy Policy**

Your trust is important to us. For that reason, Empiric Institutional (“Empiric”) safeguards that trust by keeping nonpublic personal information about you, our customers and former customers, in a secure environment and using that information in accordance with this Privacy Policy.

This Privacy Policy includes the types of nonpublic personal information we collect. These should not be considered a complete inventory of our information collection. In addition, you may have other privacy protections under some state laws. We will comply with applicable state laws regarding your information.

Below is Empiric's privacy pledge to our customers and former customers:

### **Information We May Collect**

We collect nonpublic personal information about you from the following sources that may include social security number, wire instructions, name and address:

- Information we receive from you (or is provided to us on your behalf) on applications and other forms; and
- Information about your transactions with us, our affiliates, or others.

### **Information We May Disclose and To Whom We May Disclose Information**

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except in the following circumstances:

- To companies that are necessary in order to service your account
- As required by regulatory authorities or law enforcement officials who have jurisdiction over Empiric, or as otherwise required by law

### **Our Security Procedures**

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards to guard your nonpublic personal information.

### **Explanation of Opt Out Right**

At this time, we have no intention of providing your nonpublic personal information to any nonaffiliated third parties, and we will provide you a notice and the opportunity to opt out of those disclosures prior to any such action.