

Privacy Policy

Congress passed the Gramm-Leach-Bliley (GLB) Act, which deals in part with how financial institutions treat nonpublic personal financial information. At Sonata we are committed to safeguarding the confidential information of our clients and appreciate this opportunity to share our privacy policy with you. We respect each individual's right to privacy; therefore, we will not disclose your personal information to anyone unless it is required by law, at your direction, or is necessary to provide you with our services or to professional organizations that we are members of to explain our services. We will adhere to the privacy policies and practices described below.

1. Personal Non-Public Information:

Sonata collects and maintains your personal information as part of the process of providing investment management services to you. The information we collect and maintain about you includes:

- Information we receive from you to open an account or provide investment advice to you (such as your address, social security number, and financial information);
- Information that we generate to service your account (such as account statements and internal reports);
- Information that we may receive from third parties with respect to your account (such as trade confirmations from brokerage firms and custodial statements).

2. Information We May Disclose and to Whom:

We may disclose items of your personal information in order to provide investment management services to you, which include:

- Disclosures to financial service companies that work with us in servicing your account (such as brokers and custodians).
- Disclosures to non-financial service companies that perform services on our behalf (such as our information technology consultants who assist us in maintaining our portfolio management applications).

Sonata does not have any affiliates and will not disclose any personal information to unaffiliated third parties unless you have specifically permitted us to do so or as required by law. The law allows you to "opt out" of certain kinds of information sharing with third parties. Since Sonata does not share personal information about you with any third parties that would trigger this opt-out right, you have thusly already opted out.

3. Confidentiality and Security of Nonpublic Personal Information:

We restrict access to Nonpublic Personal Information about you to those employees and other parties who must use that information to provide services to you. We maintain physical, electronic, and procedural safeguards that protect your information.