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## **PRIVACY POLICY**

**1-25-2021**

Kopion, like other professional service firms that advise on personal financial matters, is required by federal law to inform its clients of its policies regarding the privacy of client information. Kopion is committed to maintaining the confidentiality and security of its clients' personal and private information.

### **INFORMATION KOPION COLLECTS**

In the course of providing clients with investment advisory services, Kopion receives certain non-public, personal financial and private information from its clients, their accountants or other third party representatives. This information is obtained through documents such as financial statements, brokerage account application forms, and transaction information from custodians, brokers or dealers.

### **INFORMATION KOPION DISCLOSES**

All non-public information that Kopion receives regarding its clients or former clients is held in the strictest confidence in accordance with its professional obligations, and it is not released to people outside Kopion except with the client's consent or as required by law. We may disclose some or all of the information we collect to certain nonaffiliated third parties such as accountants, auditors and persons or entities who assist Kopion in its business or who are assessing Kopion's compliance with industry standards and government regulations. Kopion may also disclose information to regulators or other governmental entities as permitted or required by law.

### **CONFIDENTIALITY AND SECURITY**

Within Kopion, access to clients' non-public information is restricted to individuals who require such information in the ordinary course of servicing client accounts. In order to guard clients' non-public personal information from unauthorized disclosure, we maintain physical, electronic, and procedural safeguards. With respect to online privacy, Kopion employs certain internet-specific practices to maintain client security, including a firewall barrier, encryption and authentication procedures.