

Days Global Advisors (“Days Global” or the “Firm”)

NOTICE OF OUR PRIVACY POLICY

Protecting the privacy and security of our clients’ confidential information is important to us. This notice describes practices and policies through which we through our affiliated third parties maintain the confidentiality and protect the security of your non-public personal information.

In establishing an advisory account, it is necessary that you provide the Firm through our affiliated third parties certain personal financial information necessary to ensure that your account is managed in a manner consistent with your investment objectives and personal financial goals. This information will generally be derived from the following sources:

- Information we receive from you on account application forms and other forms, and
- Information about your securities transactions with the Firm or other advisers and broker/dealers which may be providing financial services to you.

It is the Firm’s policy that we do not disclose any non-public personal information about you to non-affiliated third parties, except as permitted by law. If you decide to close your account(s) or become an inactive customer, the Firm will adhere to the privacy policies and practices as described in this notice.

The Firm restricts access to your personal and account information to those employees who need to know that information to provide products or services to you. The Firm maintains physical, electronic, and procedural safeguards to guard your non-public personal information.