



Investor Privacy Policy

This Privacy Policy (“Policy”) explains the manner in which **Sierra Investment Management, Inc. (Sierra)**, collects, utilizes and maintains non-public personal information about investors, both current and former, who are individuals, as required under federal and other applicable data protection laws. Sierra is committed to protecting our investors’ privacy and maintaining the confidentiality and security of investor personal information. Sierra has not sold and will not sell personal information to any third party. Sierra’s affiliated companies include Ocean Park Asset Management, Inc. and Wright Fund Management LLC.

Federal law gives customers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

Information We Collect

All financial companies need to share investors’ personal information to run their everyday business. In the sections below, we list the types of information we collect, the reasons we share your personal information, and whether you can limit this sharing.

We collect the following categories and specific pieces of personal information about our investors from the following sources:

Categories of Personal Information Collected	Specific Personal Information	Sources of Personal Information
Personal Identifiers	Name, signature, address, telephone numbers, email address, social security number, date of birth, occupation, employer, annual income, estimated net worth	Account applications, Investment Advisor Agreements, questionnaires and other information provided by an investor in writing, in person, by telephone, electronically or by any other means
Protected Characteristics Under Federal Laws	Citizenship, national origin (for non-U.S. citizens and Permanent Residents)	See above
Professional or Employment-Related Information	Occupation and Employment information	See above
Financial Information	Financial and investment account information, related transactions and investments, including account balances, investments, and withdrawals/redemptions	See above

Use and Disclosure of Information

Sierra may use the personal information we collect about you for the following purposes:

- To respond to a request from you or to otherwise service your account with us or for internal business purposes, such as auditing, data analytics and research to create, develop, operate, deliver, and/or improve our investment management services and investor communications.

Sierra may share your personal information to affiliates or nonaffiliated third parties in a limited number of circumstances, as required or permitted by law, including: (i) in connection with the administration and operations of Sierra and/or to service your account(s), or to provide services or process transactions that you have requested; (ii) with Sierra's custodians, solicitors, administrators, attorneys, accountants, auditors, or other service providers; (iii) to respond to a subpoena or court order, judicial process or regulatory inquiry; (iv) to protect or defend against fraud, unauthorized transactions (such as money laundering), lawsuits, claims or other liabilities; (v) to protect the security of our records, or to protect our rights or property; (vi) in connection with a proposed or actual sale, merger, or transfer of all or a portion of Sierra's business; (vii) to otherwise assist Sierra in offering our investment management services to investors; and (viii) at an investor's direction/consent, with the investor's representatives, advisors and other third parties.

These companies to which we disclose personal information must use this information solely for the services for which Sierra hired them and are not permitted to use, reuse, or share this information for any other purpose.

Your Choices & Rights

Federal law gives you the right to limit only:

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for third parties to market to you

State laws and individual companies may give you additional rights to limit sharing.

For questions or requests regarding limiting sharing, please contact us at (310) 452-1887 or email us at info@sierrainvestment.com.

Because we need your personal information, as described herein, to provide services to you, you should be aware that limiting of sharing may prevent such services from being offered or continued.

How Sierra Protects Personal Information

Sierra takes the security of personal information provided to use very seriously and we have implemented commercially reasonable physical, electronic, and procedural safeguards to try to ensure the protection of your personal information. We only keep your personal information for as long as required to provide you with the services you request, for the purposes outlined in this Policy, and for any legal purpose for which we are obligated to keep the information. Sierra restricts access to your personal and account information to those employees who need to know that information to provide investment management services.

Changes to this Policy

Sierra reserves the right to change this Policy at any time and without notice. Where the change is material, we will provide notice to you as required by data protection laws.