

# **PRIVACY NOTICE**

## **For Individual Steeplechase Investments Advisor Clients**

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Protecting your privacy is fundamental to the way Steeplechase Investments conducts business. This Privacy Notice explains the types of information we collect from our individual clients in order to provide investment advisory planning services, how we may use or disclose that information; and the measures we take to safeguard that information. (Steeplechase Investments is referred to as “we,” “our,” or “us,” and individual clients of Steeplechase Investments are referred to as “you” or “your”).

### **What Information Do We Collect?**

We collect non-public personally identifiable information about you as described in this section to provide our Services. We refer to all of this information as “Client Information.”

- Client Information from you: We may collect your name, address, social security number, family and marital status, investment objectives, financial goals, risk tolerance, and information about your income, assets, investments, liabilities, expenses and personal financial transactions.
- Client Information from other sources: For investment advisory services, we may collect trading and transaction history for your investment advisory account, and statements or records we receive from investment firms, tax preparations firms, and other professionals that you have retained and authorized to provide information directly to us.

### **How Do We Use and Disclose Client Information?**

We use Client Information to:

- Provide services
- Provide advice and information to help you meet your financial objectives, including information about other products and services that may be of interest
- Fulfill our obligations to the SEC, FINRA, Illinois Secretary of State, and any other regulatory or government body to whom we are required to report or to fulfill certain background checks relating to the USA Patriot Act.

In order to provide our Services, we may disclose Client Information to non-affiliated companies that perform services for us (“service providers”), such as companies that provide transaction processing, or performance reports and

statements of account for assets under management. We require all service providers to have written contracts with us that specify appropriate uses of Client Information.

We may also disclose Client Information to non-affiliated third parties for other purposes required or permitted by law or regulation. Such necessary disclosures may include:

- To comply with a court order, legal process, or other judicial or investigative proceeding that produces a request for information from us;
- To permit auditing of account information;
- To fulfill or respond to a request from you or your authorized representative;
- To sell or transfer our business or assets; and
- As otherwise described in this Privacy Notice

### **Your Choices about Certain Uses and Disclosures of Client Information**

Steeplechase Investments use and disclosure of Client Information is governed by the Gramm Leach Bliley Act of 1999, certain other laws, and our policies.

Disclosure to Non-Affiliated Third Parties: *The Gramm Leach Bliley Act of 1999* requires that we give you the option to prohibit disclosure of your non-public personal information to non-affiliated third parties for marketing purposes, if we will make such disclosures. This is referred to as an “opt-out” right. We only disclose such information with your prior written consent, so it is not necessary for us to provide you with the opportunity to opt-out of having your information disclosed in this manner. To consent, you should sign our Disclosure Authorization Form.

If a state law requires us to give you the right to opt-out prior to disclosure of your personal information, we will not disclose your information for such purposes without your prior consent.

### **How We Protect Your Information**

We at Steeplechase Investments are bound by codes of professional conduct, to protect the confidentiality of Client Information, and to prevent unauthorized use, access to, or disclosure of Client Information. The use of, and access to Client Information is restricted to those employees who need to know that information to provide Services to you. We maintain commercially reasonable physical, electronic, and procedural safeguards to protect Client Information from unauthorized access and disclosure.

## **Former Clients**

If you are no longer a client of Steeplechase Investments, we continue to use, disclose and safeguard Client Information as described above.

This privacy Notice applies to individual clients of investment advisory services provided by Steeplechase Investments, an Illinois Registered investment adviser.