

PRIVACY NOTICE

The terms “**Northcoast Research Partners, LLC**” (“NCRP”), as used herein, shall mean and include any and all subsidiaries, parent or sister corporations, limited liability companies, partnerships or other entities or entity controlling, controlled by or under common control with said company, including, but not limited to **Northcoast Research Partners, LLC**.

The Securities and Exchange Commission has adopted Regulation S-P, privacy rules promulgated under section 504 of the Gramm-Leach-Bliley Act. Section 504 requires the Commission and other federal agencies to adopt rules implementing notice requirements and restrictions on a financial institution's ability to disclose nonpublic personal information about consumers.

Under the Gramm-Leach-Bliley Act, a financial institution must provide its customers with a notice of its privacy policies and practices, and must not disclose nonpublic personal information about a consumer to nonaffiliated third parties unless the institution provides certain information to the consumer and the consumer has not elected to opt out of the disclosure.

This notice, in summary form, is intended to tell you where we obtain information about you and who has access to it once it is received by NCRP.

Source of Information. The information gathered about you primarily originated directly from documents that you provided us. Such information came from forms that you complete in order to receive our services and in the records that we keep pertaining to each transaction. In addition, we maintain records of each of your transactions and holdings.

Third Party Sharing of Information. NCRP does not sell client information. Client information derived from the aforementioned information source may be provided to outside parties under the following conditions:

1. **Processing to facilitate client business.** E.g. transmission of an account and transactional information to the client's custodian. By agreement, third parties in this case are prohibited from using information about the client beyond the specified purpose.
2. **As required or permitted by law or regulation.** E.g. responses to a subpoena, court order or regulatory demand.
3. **As authorized by Client.** Client may, on occasion, direct NCRP to provide specific information to a third party.

Confidentiality and Security. NCRP considers its clients and all information it receives from the clients to be confidential, unless the clients state otherwise. Client information will only to be handled in the manner described in this notice. NCRP restricts access to information about its clients to those employees and authorized agents who need to know specific information to effectively deliver products or services to that client. NCRP has instituted measures to ascertain confidentiality of its clients' information in compliance with federal standards.

Clients are free to ask NCRP about information with regard to client financial privacy.