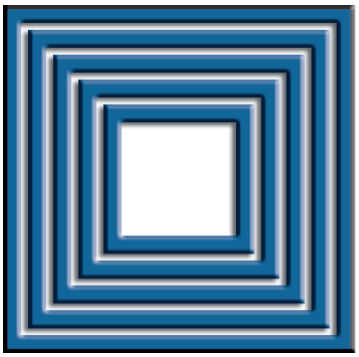


Privacy Policy

$5^{th}\mathcal{N}$ *Financial, LLC*

FACTS	WHAT DOES $5^{th}\mathcal{N}$ Financial DO WITH YOUR PERSONAL INFORMATION?
WHY?	Financial companies choose how they share your personal information. Federal law gives consumers 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.
WHAT?	The types of personal information we collect and share is based on you allowing us to serve as your financial adviser. This information can include: • Social Security Number • Income • Address • Account Balances • Financial Status • Employment, etc.
HOW?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons $5^{th}\mathcal{N}$ Financial chooses to share; and whether you can limit this sharing.

Who we are	
Who is providing this notice?	$5^{th}\mathcal{N}$ Financial, LLC
What we do	
How does $5^{th}\mathcal{N}$ Financial protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. • For details see Data Protection Section Below
How does $5^{th}\mathcal{N}$ Financial collect my personal information?	We collect your personal information when you • Open/Request an account under our management We also collect and verify your personal information from your account information at Interactive Brokers
Why can't I limit all sharing?	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 nonaffiliates to market to you

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. • $5^{th}\mathcal{N}$ Financial has no Affiliates
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. • $5^{th}\mathcal{N}$ Financial maintains a relationship with Interactive Brokers. This relationship is maintained due to our use of their brokerages services. They (Interactive Brokers) will have custody of your funds and securities.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. • $5^{th}\mathcal{N}$ Financial has no relationship with any joint marketing firms.

Reasons we can share your personal information	Does $5^{th}\mathcal{N}$ Financial share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	NO
For our marketing purposes— to offer our products and services to you	NO	YES
For joint marketing with other financial companies	NO	YES
For our affiliates' everyday business purposes— information about your transactions and experiences	NO	YES
For our affiliates' everyday business purposes— information about your creditworthiness	NO	YES
For our affiliates to market to you	NO	YES
For nonaffiliates to market to you	NO	YES

Since we do not share your information with anyone except Interactive Brokers and have no affiliates or non-affiliates, there is no reason to request any limitations on sharing of your data.

1 Privacy Policies

$5^{th}\mathcal{N}$ *Financial* is committed to safeguarding the use of personal information of our current and future clients. Our relationship with you is our most important asset. We understand that current clients have entrusted us with their most private information by entering into a Client-Advisory relationship. We do everything we can to maintain that trust. $5^{th}\mathcal{N}$ *Financial* protects the security and confidentiality of the personal information we have on file. $5^{th}\mathcal{N}$ *Financial* implements controls to ensure that this information is used for proper purposes relating to our Client-Advisory relationship.

Under no circumstance does $5^{th}\mathcal{N}$ *Financial* sell **any** information about our clients. $5^{th}\mathcal{N}$ *Financial* does not share this information to others except in the course of fulfilling our commitment to you as your financial adviser, as discussed below.

1.1 Client Information

$5^{th}\mathcal{N}$ *Financial* must share some of your personal information in order to fulfill our advisory commitment to you. This includes the Client-Advisor-Custodian communication triad. Both federal and state laws give you, the client, the right to limit some of this information sharing and require registered investment advisors (like

$5^{th}\mathcal{N}$ *Financial*) to disclose how we collect, share and protect your information. In order to become a client of $5^{th}\mathcal{N}$ *Financial* we must collect the following information:

- Name, address and phone numbers;
- E-mail addresses;
- Social security or other taxpayer identification numbers;
- Account information at other institutions;
- Assets and liabilities;
- Income and expenses;
- Investment goals and experience;

We must also collect information from other sources in the course of executing our duties as your advisor. These include:

- Custody and brokerage agreements;
- Related advisory agreements and legal documents;
- Account application and forms;
- Investment questionnaires and documents relating to investment suitability;
- Any other document needed to execute our duties.

To safeguard your information from unauthorized access we maintain electronic, physical and procedural security measures. Our technology vendors/partners provide security and access control over personal data as well as policies over data transmission.

1.2 Future Client

In the process of generation information for in-house mailing (solicitation of new clients) we may be in position of the following information for non-clients:

- Name, address and phone numbers;
- E-mail addresses.

This information is treated exactly as if these solicitations are clients. As a result, **no** information related these possible future clients are sold or shared in any way with anyone. This information is protected using the same rigorous methodologies used for our current clients.

1.3 Data Protection

Client information collected by $5^{th}\mathcal{N}$ Financial is stored in two locations. These include:

- On 4 in-house computer systems.
- In password protected cloud based storage.

1.3.1 In-House Systems

The in-house systems are always locked in a fire and water proof safe when not in use. In addition, the in-house systems are in a facility with multiple 24/7 video camera systems. Of these four computer systems, two never leave the in-house location. The other two computer systems that occasionally leave are encrypted in the following way:

- Use of Device Encrypted BitLocker drive. This ensures the safety of the data by not allowing anyone to remove the disk

from the system and access the drives data from another machine. Unlocking the disk and or computer may only be done through a password. (*Windows 10 OS*)

- Use of LVM (Logical Volume Management) with encryption to safeguard the OS installation as well as all data on the drives. This required the use of two passwords, one to open or unencrypt the hard drive for operation and the other password to login to the system. This also ensures that the drive can not be access by steeling it and placing it into another computer. (*Ubuntu OS*)

1.3.2 Cloud Based Storage

Two different cloud based storage methods are used, DropBox and Google Drive. Both systems use encryption of passwords and intransient data. Both are password based. $5^{th}\mathcal{N}$ Financial uses two factor authentication for both systems. In addition, $5^{th}\mathcal{N}$ Financial runs a periodic security audit which includes

- Changing all passwords
- Use of non-english or other language words in passwords.
- Auditing the list of computer systems allowed to sync with the cloud based storage systems.

1.3.3 Interactive Brokers System Access

Client information is also accessible through the custodian's system (Interactive Brokers). $5^{th}\mathcal{N}$ Financial uses two factor authentication to access their system as well.

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