

Pendragon Capital Management, Inc.
23 Heath Road - Fishkill, NY 12524

PRIVACY POLICY NOTICE

Pendragon Capital Management, Inc. (“we” or “our”) respects your right to privacy and recognizes our responsibility for protecting the privacy and security of the personal information we receive from you. We have always been committed to securing the confidentiality and integrity of your personal information. We are proud of our privacy practices and want our current and prospective customers to understand what information we collect and how we use it.

Why We Collect Your Information

We gather and keep only information about you that is necessary for us to provide the services requested by you, administer your business with us, design and improve the services we offer and comply with the laws and regulations that govern us.

What Information We Collect

We may collect the following types of ‘nonpublic personal information’ about you:

- Information about your identity, such as your name, address, and social security number;
- Information about your transactions; and
- Information about your personal financial profile, such as your risk tolerance levels, goals and objectives, assets, liabilities, savings, and investments.

What Sources We Obtain Your Information From

We collect nonpublic personal information about our clients, such as you, from the following sources:

- Information we receive from you on contracts or other forms; such as risk tolerance questionnaires and/or investment policy statements.
- Information about your transactions with our affiliates, or others.
- If you visit our web site, information we collect via a web server, is often referred to as a “cookie.” Cookies indicate where a site visitor has been online and what has been viewed.

What Information We Disclose

We only share your nonpublic personal information with non-affiliated companies or individuals as permitted by law, such as your representative within our firm, affiliates, mutual funds, insurance companies, and other product vendors, or to comply with legal or regulatory requirements. With your approval, we also may share information with your advisors, which can include your accountant and/or attorney. Additionally, in the normal course of our business, we may disclose information we collect about you to companies or individuals that contract with us to perform servicing functions such as:

- Record keeping;
- Computer related services;
- Good faith disclosure to regulators who have regulatory authority over the company.

Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested. Notwithstanding the above, we will not release information about our customers or former customers unless we receive your prior written consent, we believe the recipient to be you or your authorized representative or we are required by law to release information to the recipient.

We do not sell your personal information to anyone.

Confidentiality and Security

We maintain physical, electronic, and procedural safeguards to guard your personal information. We also restrict access to your personal and financial data to our authorized associates who have a need for these records. We require all nonaffiliated organizations and vendors to keep client data confidential and use appropriate security measures to protect it. They must also be contractually obligated to keep the information provided confidential and used as requested. Furthermore, we will continue to adhere to the privacy policies and practices described in this notice even after your account is closed or becomes inactive.

Changes to Our Privacy Notice

We will continue to conduct our business in a manner that conforms to our pledge to you, your expectations and all applicable laws; however, our policy about obtaining and disclosing information may change from time to time. We will provide you with notice of any material change to this policy before we implement the change.

Cookies and Other Tracking Technologies

We may track users by IP address, by cookies (e.g., pieces of code or text placed on your computer by us or third parties when you browse our websites), by web beacons and other data collection methods for broad demographic data, as well as to help make sure that we are delivering the information you want. Our website sends cookies to your web browser (if your browser’s preferences allow it) to collect data when you browse our website(s). Cookie settings can be controlled in your Internet browser to automatically reject some forms of cookies. If you view our website without changing your cookie settings, you are indicating your consent to receive all cookies from our website(s). If you do not allow cookies, some features and functionality of our website(s) may not operate as expected. In addition to cookies, we place technological tools (and allow certain third parties to place technological tools) such as tags and beacons (e.g., code scripts that are primarily used to track visitors’ activities on our

website(s) by web analytics software), Internet Protocol (IP) addresses, and other tools, to collect your data for the purposes listed in this Privacy Policy. “Do Not Track” signals are options available on your browser to tell operators of websites that you do not wish to have your online activity tracked. Our websites operate no differently if these “Do Not Track” signals are enabled or disabled.

California Privacy Rights Spam

Under California Civil Code Section 1798.83, California customers are entitled to request information relating to whether a business has disclosed personal information to any third parties for the third parties’ direct marketing purposes. That notice will identify the categories of information shared and will include a list of the third parties and affiliates with which it was shared, along with their names and addresses. If you are a California resident and would like to make such a request, please submit your request in writing at the address information below.

Opt-Out Provisions

We have taken steps to assure that all third-party vendors have confidentiality clauses to protect your information. Should we not have such written agreements in place, then you have the option to “opt-out” of the sharing of this information. If you desire to opt out for those instances that we do not have the confidentiality clause, you should provide us with written instructions forwarded to Chief compliance Officer at the address set out above. Additionally, the law allows you to "opt out" of only certain kinds of information sharing with third parties. We do not share personal information about you with any third parties that trigger this opt-out right. This means you are already opted out of these sharing situations.

To Contact Us

If you have questions regarding our privacy policy, please contact us at (917) 837-2287.