

TWELVE POINTS WEALTH MANAGEMENT

PRIVACY OF CONSUMER INFORMATION

At Twelve Points Wealth Management (“we” or “our”), maintaining the trust and confidence of our investors is of paramount importance. We are committed to safeguarding your personal information and providing you with facts and options about how this information may be shared. Please read this notice to learn more about our privacy policies and the options available to you.

This notice replaces all previous statements of our privacy policy, and may be amended at any time. We will provide you with annual reminders of our policies and with revised policies if there are any changes in how we handle your personal information. If you end your relationship with us, we will continue to adhere to the policies and practices described in this notice. If you have any questions about this privacy policy you may call us at 978-318-9500.

Information That We Collect. As part of providing you with our services we obtain nonpublic personal information about you which may include the following:

- Name
- Address
- Phone Number
- Social Security Number

Information That We Share. We, along with our affiliates, use or share information in a limited and carefully controlled manner. We do not disclose any nonpublic information about our clients or former clients to anyone, except as permitted by law, unless authorized by you. Instances in which we may be required to share your information include:

* Disclosure to companies that provide services necessary to effect a transaction that you request or to service your account such as prime brokers, accountants, banks, attorneys or administrators.

* Disclosure to government agencies, courts, parties to lawsuits, or regulators in response to subpoenas. In such cases, we share only the information that we are required or authorized to share.

We will disclose, as necessary, the client’s information: (1) to unaffiliated service providers and vendors in furtherance of establishing, maintaining, and reporting on the client’s relationship with us (i.e., broker-dealer, account custodian, record keeper, technology, performance reporting, customer relationship management software [CRM], proxy voting, insurance, independent managers, sub-advisers, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with applicable federal and/or state privacy regulations. However, we do not, and shall not, disclose or share information with any affiliated or unaffiliated persons, entities or service providers for marketing or any other purposes or reasons not referenced above.

Confidentiality and Security. The security of your account information is important to us. Only those persons who need your information to perform their job have access to it. In addition, we maintain physical, electronic and procedural security measures that comply with U.S. regulations to protect your information. Our employees have limited access to your personal information based upon their responsibilities. All employees are instructed to protect the confidentiality of your personal information as described in these policies, which are strictly enforced.