

CONNEMARA FAMILY OFFICE MANAGEMENT, LLC

PRIVACY STATEMENT

Financial institutions, including investment advisors, must provide consumers with an annual notice of the Firm's 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. You will want to review these privacy notices to understand which firms may be sharing or selling information about its clients and if desired, you will want to "opt out" of this process. (In the opinion of Connemara, this process is flawed; consumers should affirmatively have to "opt in".) In most cases, this can be accomplished by a signed and dated letter.

As your fiduciary, Connemara Family Office Management, LLC will do as much as it can possibly do to protect your privacy. We recognize that we are privileged with extremely sensitive information about you. We have put into place a variety of safeguards to keep this information confidential.

The types of confidential information we possess generally will include:

- Information provided from applications, forms, and other information provided to us either verbally or in writing, including, but not limited to, your name, address, telephone number, email address, account information, Social Security number, employment information, income, assets, and debts;
- Information about your financial transactions, accounts, trading activity, and parties to transactions; and
- Other information from outside sources

We will never reveal your name to friends, family, or associates without your express written permission.

We would never even consider renting or selling any aspect of your personal information to any other person or entity.

We will share the information that is essential to share, but only when you have directed us to do so. To share your information we will need a written authorization or a signed application to facilitate financial services offered through our firm.

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Please be advised, however, that we will share your information, without your consent, if we are required to do so by law or regulation.

Here are a few examples of when we might share your information:

From time to time throughout the year, you may authorize us to share information with your accountant. You may desire to utilize investment or insurance services with an unaffiliated financial services firm (broker/dealer, custodian, trust department or insurance company) and in writing or by application, you will be directing us to share information in order to work with these firms on your behalf and only for the services you have requested.

On the regulatory front, the custodian that buys, sells, and holds the financial instruments we may manage on your behalf is required by its regulators (NASD) to collect personal information about you (typically on application forms). Additionally, since Connemara Family Office Management, LLC is regulated by the State of Maryland Securities Division, we expect regular audits by the State to ensure compliance with rules and regulations. By law, we are required to make available to State auditors for their review all non-legal files and records without your consent. Legal files and documents containing attorney work product may be confidential and may contain privileged information. Connemara Family Office Management, LLC and Thomas B. Conway in his capacity as an attorney licensed to practice law in Maryland and the District of Columbia maintain separate legal files with respect to all confidential client legal documents and information.

Connemara Family Office Management, LLC restricts access to its records to those persons who have a need to obtain information in order to deliver professional, advisory or administrative services at your instructions or request. Access to your records is restricted through a variety of means. We are for example, largely a “paperless” office. Both our business and home offices are monitored by security systems. While we may have in our possession for a limited period of time physical paper or other materials containing confidential information, typically such documents are obtained at the time of an initial or specific follow-on service engagement or when we are updating our records with new information. As soon as we are engaged or obtain new information, we scan any documents you provide, retaining only digital copies thereof. We also immediately input any new information into our computer systems. All originals are then returned to you.

The majority of paper containing daily work product is shredded. We shred all of our drafts, notes, and worksheets on a daily basis. Physical client files are stored in a locked filing cabinet. The only paper in these files containing confidential client information is the signed contract authorizing us to work for you. All remaining confidential client documents and information is

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maintained either locally on encrypted compact discs or external drives or, more typically, remotely on encrypted institutional level secure servers. These discs, drives or servers contain encrypted files of all of our worksheets, correspondence, scanned documents, and copies of our reports and memoranda to you. Certain files containing confidential information may from time to time be on our computers, but any such files are likewise encrypted and all firm computers are multi-level password protected. All mobile communication devices, including Blackberry devices, are password protected. All email communication is multi-layer encrypted. Security codes for office and home alarm systems, computer log-in codes, and codes for access to encrypted files are all different and where possible are considered “strong”, meaning that they make use of upper and lower case letters, numbers, and/or symbols.

Connemara Family Office Management, LLC takes the privacy of its clients very seriously. Thomas B. Conway, its President and Founder, is a practicing attorney and former senior private banker. Mr. Conway benefits from having more than a decade of experience working in leading global financial institutions where financial information security and privacy were subject to constant attack. If at any time you should have any questions or concerns regarding our privacy policy and procedures, please do not hesitate to ask.