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**FACTS**

**WHAT DOES OCCIDENTAL ASSET MANAGEMENT, LLC (OCCAM) 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 depends on the product or service you have with us. This information can include:

- Social security number and income
- Account balances and fees paid

**How?** All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their client's personal information; the reasons OCCAM chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does OCCAM share?	Can you limit this sharing?
<b>For our everyday business purposes –</b> such as to comply with applicable securities laws, compile your capital account balances, process your transactions, maintain your accounts, respond to court orders and legal investigations	Yes	No
<b>For our marketing services –</b> to offer products and services to you	No	We don't share
<b>For our affiliates everyday business purposes –</b> Information about your transactions and experience	No	We don't share
<b>For non-affiliates to market to you</b>	No	We don't share

**Questions?** For additional information, contact Nathan Walsh at 650.344.1600 or toll-free at 866.520.4985 or visit our website: [www.occamlc.net](http://www.occamlc.net).

Who we are	
Who is providing this notice	Occidental Asset Management, LLC (OCCAM)
What we do	
How does OCCAM 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 restrictions on access to those who need the information, obtaining assurances of confidentiality from third-party service providers, computer safeguards and secured files and buildings.
How does OCCAM collect personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> <li>• Subscribe for interests in our funds or deposit money</li> </ul>
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>• Sharing for affiliates everyday business purposes</li> <li>• Affiliates from using your personal information to market to you</li> <li>• Sharing for non-affiliates to market to you</li> </ul> State laws may give you additional rights to limit sharing.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• OCCAM sole affiliate is its parent holding company, Occam Capital, LLC that is wholly owned by OCCAM's principals</li> </ul>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market products or services to you <ul style="list-style-type: none"> <li>• OCCAM has no joint marketing agreements</li> </ul>