

## **Our Privacy Policy:**

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to assure that our customers are confident that we will manage their financial affairs expertly and confidentially.

At Swan Global Investments, LLC, we are required to acquire and retain certain personal and private client information to provide the services we offer. It is essential that we use discretion and technology to manage and maintain certain customer information.

We want to assure all of our customers that whenever information is used, it is done with discretion. The safeguarding of customer information is an issue we take seriously at Swan Global Investments, LLC. To affirm our continuing commitment to the proper use of customer information, we have set forth the following Privacy Policy that guides us in serving the privacy needs of our customers. This Privacy Policy governs the manner in which Swan Global Investments collects, uses, maintains and discloses information collected from users (each, a "User") of the <http://www.swanglobalinvestments.com> website ("Site"). This privacy policy applies to the Site and all products and services offered by Swan Global Investments.

**Recognition of a Customer's Expectation of Privacy:** Swan Global Investments, LLC, believes the confidentiality and protection of customer information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our customers' trust. Thus, the safekeeping of customer information is a priority for Swan Global Investments, LLC.

**Use, Collection, and Retention of Customer Information:** Swan Global Investments, LLC limits the use, collection, and retention of customer information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our customers. Information collected may include, but is not limited to name, email, address, IP Address, telephone number, tax identification number, date of birth, employment status, annual income, and net worth.

**Maintenance of Accurate Information:** Swan Global Investments, LLC recognizes that it must maintain accurate customer records. Therefore, Swan Global Investments, LLC has established procedures to maintain the accuracy of customer information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.

**Limiting Employee Access to Information:** At Swan Global Investments, LLC, employee access to personally identifiable customer information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer information and on this Privacy Policy. Because of the importance of these issues, all Swan Global Investments, LLC employees are responsible for maintaining the confidentiality of customer information and employees who violate these Privacy Principles will be subject to disciplinary measures.

**Protection of Information via Established Security Procedures:** Swan Global Investments, LLC recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, Swan Global Investments, LLC has established appropriate security standards and procedures to guard against any unauthorized access to customer information.

**Personal identification information:** We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our site, fill out a form, and in connection with other activities, services, features or resources we make available on our Site. Users may visit our Site anonymously. We will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personal identification information, except that it may prevent them from engaging in certain Site related activities.

**Non-personal identification information:** We may collect non-personal identification information about Users whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer and technical information about Users means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.

**Web browser cookies:** Our Site may use “cookies” to enhance User experience. User’s web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

**How we use collected information:** Swan Global Investments may collect and use Users personal information for the following purposes: 1)to improve our Site- We may use feedback you provide to improve our products and services; 2)to send periodic emails- We may use the email address to respond to their inquiries, questions, and/or other requests. If User decides to opt-in to our mailing list, they will receive emails that may include company news, updates, related product or service information, etc. If at any time the User would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email or User may contact us via our Site.

**How we protect your information:** We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

**Sharing your personal information:** We do not sell, trade, or rent Users personal identification information to others. We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the purposes outlined above. We may use third party service providers to help us operate our business and the Site or administer activities on our behalf, such as sending out newsletters or surveys. We may share your information with these third parties for those limited purposes provided that you have given us your permission.

**Restrictions on the Disclosure of Customer Information:** When it comes to sharing customer information with unaffiliated companies, Swan Global Investments, LLC, places strict limits on who receives specific information about customer accounts and other personally identifiable data. Swan Global Investments, LLC may share information with such companies if they provide a product or service that may benefit our customers. Whenever we do this, we carefully review the company and the product or service to make sure that it provides value to our customers. We share the minimum amount of information necessary for that company to offer its product or service. We may also share information with unaffiliated companies that assist us in providing our products and services to our customers; in the normal course of our business (for example, with consumer reporting agencies and government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of a customer.

**Changes to this privacy policy:** Swan Global Investments has the discretion to update this privacy policy at any time. When we do, we may post a notification on the main page of our Site. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

**Your acceptance of these terms;** By using this Site, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

**Maintaining Customer Privacy in Business Relationships with Third Parties:** If we provide personally identifiable customer information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.

**Disclosure of Privacy Policy to Customers:** Swan Global Investments, LLC recognizes and respects the privacy expectations of our customers. We want our customers to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to our customers. Customers who have questions about these Privacy Principles or have a question about the privacy of their customer information should call Swan Global Investments, LLC at 970-382-8901.

This Privacy Policy applies to individuals, and we reserve the right to change our Privacy Policy, and any of the policies or procedures described above, at any time without prior notice. The Privacy Policy are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our customers.