

POLEN | CAPITAL

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PRIVACY POLICY NOTICE

This Privacy Policy explains the manner in which Polen Capital Management, L.L.C., collects, utilizes and maintains nonpublic personal information about the individuals with which it conducts or may conduct business. Polen considers privacy an essential aspect of its client relationships. This Privacy Policy applies only to nonpublic information about individuals who conduct business with Polen for personal, family, or household purposes and not business purposes (collectively, “Clients”).

Collection of Investor Information

Polen collects personal information about Clients from the following sources:

1. Account documentation, questionnaires and other information provided by the Client, or a fiduciary or other person acting on behalf of the Client, in writing, in person, by telephone, electronically or by any other means. This information includes, among other information, name, address, social security number, employment information, and financial and investment qualifications and objectives; and
2. Transactions in the Client’s account, including account balances, investments, contributions and withdrawals.

Disclosure of Nonpublic Personal Information

Polen may share nonpublic personal information about Clients or potential Clients with its affiliates, as permitted by law, including to assist Polen in offering or providing services and products to Clients. Polen does not disclose nonpublic personal information about Clients or potential Clients to nonaffiliated third parties, except as permitted or required by law. For example, Polen may share nonpublic personal information with nonaffiliated third parties, without the Client’s consent, in the following situations:

1. To respond to a subpoena or court order, judicial process or regulatory or governmental inquiry;
2. To protect or defend against fraud, unauthorized transactions (such as money) laundering), law suits, claims or other liabilities;
3. To service providers of Polen in connection with the administration and operations of Clients’ accounts, which may include attorneys, accountants, auditors, administrators or other professionals;
4. To process or complete transactions requested by a Client; and
5. Upon consent of a Client to release such information, including authorization to disclose such information to persons acting in a fiduciary or representative capacity on behalf of the Client.

Former and Prospective Clients

The same Privacy Policy applies to former and prospective Clients.

Protection of Investor Information

Polen maintains physical, electronic and procedural safeguards that comply with federal standards to protect customer information. Within Polen, access to the personal and account information of Clients is restricted to those employees who need to know that information in the course of their job responsibilities.

Further Information

Polen reserves the right to change this Privacy Policy at any time. The examples contained within this notice are illustrations and are not intended to be exclusive. This notice complies with Federal law regarding privacy. Clients may have additional rights under other applicable foreign or domestic laws.

Please do not hesitate to contact us if you have any questions.