



Spotlight Asset Group, Inc.

PRIVACY NOTICE

This notice is being provided to you in accordance with Regulation S-P, the Securities and Exchange Commission's rule regarding the privacy of consumer financial information. Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information (in other words, personally identifiable financial information and any list, description or other grouping of consumers that is derived using any personally identifiable financial information that is not publicly available).

What information we collect

In the course of providing services to you, we may collect the following types of nonpublic personal information:

- Information we receive from you in an advisory agreement or other documents that you, as a customer, may deliver to us;
- Information about your transactions with us, brokers, custodians or others;
- Information we receive from discussions, meetings or other correspondence (whether oral or written); and
- Information we receive about you from your purchaser representative, financial advisor, investment consultant or other financial institution with whom Spotlight has a relationship and/or whom you may have authorized to provide such information.

What information we disclose

We do not disclose any nonpublic personal information about our customers, former customers or prospective customers except as permitted or required by law. Under Reg S-P, we may disclose nonpublic personal information we collect to certain nonaffiliated third-parties as necessary to effect, administer or enforce a transaction that a customer has requested or authorized, as well as in connection with processing or servicing a financial product or service a customer requests or authorizes, among other reasons. In addition, in the normal course of business, we may provide nonpublic personal information we collect to certain nonaffiliated third-parties that perform services for us or functions on our behalf, including administrators, accountants and lawyers, among others. We enter into contractual agreements and/or ensure confidentiality provisions are in place with such nonaffiliated third-party service providers that prohibit such third-parties from disclosing or using the information other than to carry out the purposes for which we disclosed the information.

Confidentiality and security procedures

To protect your personal information, we permit access only by authorized personnel. We maintain physical, electronic and procedural safeguards to protect the confidentiality, integrity and security of your nonpublic personal information.

We will continue to adhere to the privacy policies and practices in this notice even after your account is closed or you otherwise are no longer a customer of ours.

Additional rights

You may have other privacy protections and rights under applicable state laws. To the extent those state laws apply, we will comply with them with respect to your nonpublic personal information.