

# NEW CAPITAL

## Our Privacy Policy

In providing financial services and products to you, New Capital Management collects certain non-public personal information about you. Our policy is to strictly safeguard and keep confidential this information, and to use or disclose it only as necessary to provide our services or products to you, or as permitted or required by law. Our privacy policy applies equally to our clients, prospective clients, and former clients. Your privacy, our professional ethics, and the ability to provide you with quality financial services are all vitally important to us.

**INFORMATION WE COLLECT.** “Nonpublic personal information” is personally identifiable financial information about you as an individual or your family that is provided to us by you or obtained by us with your authorization. The nonpublic personal information we collect includes the information you give us when you first meet with us or open an account with us, and includes information such as your name, address, telephone number, your employment, family, and personal financial situation, your financial details, your background and personal history, and your investment objectives. We also have information about your investment account assets and transactions, including your holdings and transactions in fund shares, the brokerage and custodial arrangements for your account, and your relationship with New Capital Management.

**INFORMATION WE DISCLOSE.** We do not disclose any non-public personal information obtained in the course of our practice except as required or permitted by law (for example, by our primary regulator the US Securities & Exchange Commission). Permitted disclosures also include providing information to our staff, and in limited situations, to unrelated third parties who need to know that information to assist us in providing services to you (for example, an estate attorney or insurance agent working on your behalf). Permitted disclosures also include our data entry and data transfers into third party systems for the fulfillment of our services including but not limited to client relationship management systems, portfolio analytics systems, data aggregation systems, financial planning systems, and investment policy statement generation systems. In all such situations, we stress the confidential nature of information being shared and rely on service providers whom we believe to be qualified based on our knowledge of them.

**HOW WE SAFEGUARD YOUR INFORMATION.** We retain records relating to professional services that we provide so that we are better able to assist you with your professional needs and, in some cases, to comply with professional guidelines. We limit access to your nonpublic personal information to those persons who need to know it or who are permitted by law to receive it. In order to guard your nonpublic personal information, we maintain physical, electronic, and procedural safeguards that comply with our professional standards.

**WHEN WE WILL NOTIFY YOU.** If you are a current client, we will provide an annual Privacy Policy notice to you. If you no longer have a client relationship with us, we will continue to follow our Privacy Policy and practices, but you will not receive future notices from us.

**CHANGE IN PRIVACY POLICY.** We reserve the right to modify or supplement our Privacy Policy at any time. If we make material changes, we will provide current clients with a revised notice that describes our new practices.

If you have any questions regarding our Privacy Policy, please contact our office:

3355 West Alabama St., Suite 275, Houston, TX 77098

Phone (713) 874-1444