

Sunrise Capital Management LLC

Investment Privacy Policy

Sunrise Capital Management LLC (SCM) is committed to maintaining the confidentiality, integrity, and security of personal information about our current and prospective customers. In this policy personal information means "personally identifiable information."

Please note that certain details of this policy may depend on whether you deal with us through an investment professional, directly as an individual investor, or whether Sunrise Capital Management LLC provides services to your employer or plan sponsor.

Our Privacy Principal:

We do not sell client information.

Sunrise Capital Management LLC does not share personal information about our customers with unaffiliated third parties for use in marketing their products and services.

How and why we obtain personal information

Sunrise Capital Management LLC takes great care to protect personal information about you and when we use it, we do so with respect for your privacy. We may use personal information about you to service, maintain, and protect your account; process transactions in your account; respond to inquiries from you or your representative; develop, offer, and deliver products and services; or to fulfill legal and regulatory requirements. SCM may collect public and non-public personal information about you from any of the following sources:

- Information that you provide on applications, questionnaires, subscription documents, or other forms including name, address, social security number, assets, spending habits, investment objectives, financial goals, statements of account, and other records concerning your financial interests, wills, trusts, mortgages, tax returns, and income.
- You or your employer or plan sponsor if SCM provides them with recordkeeping and/or benefits advisory services (for example, payroll, human resources, or benefits information)
- Information about your transactions with us, our affiliates, or others (e.g. broker/dealers, custodians, clearing firms, or other chosen investment providers, record keepers, and insurance providers) such as balances, monthly statements, payment history, parties to transactions, and account usage.
- Other interactions with SCM (for example, discussions with our customer service staff, RIA's and IAR's.
- Information from consumer reporting agencies (for example, to assess your creditworthiness for margin products)
- Information from other third-party data services (for example, to verify your identity and to better understand your product and service needs)
- You or your representative regarding your preferences

- Other sources with your consent or with the consent of your representative (for example, from other institutions if you transfer positions into SCM)

How we protect information about you

- Sunrise Capital Management LLC considers the protection of personal information to be a foundation of customer trust and a sound business practice. We employ physical, electronic and procedural controls, and we regularly adapt these controls to respond to changing requirements and advances in technology.
- At Sunrise Capital Management LLC, we restrict access to personal information to those who require it to develop, support, offer and deliver products and services to you.

How we share information about you with third parties

Sunrise Capital Management LLC does not share personal information about our customers with unaffiliated third parties for use in marketing their products and services. We may share personal information with the following entities:

We may disclose personal information we collect, such as the categories described above, to make our financial products and services, as well as those offered by our service providers, available to you. We may also use and disclose personal information with your consent. If you decide to withhold certain information, it may limit our ability to provide you with the services or products you request or that may be of interest to you. We do not disclose personal information about former customers to anyone outside of our affiliated companies except as permitted or required by law; to cooperate with regulators and law enforcement authorities; and to current or former corporate clients Sunrise Capital Management LLC to provide reporting and other services consistent with the terms of an employee stock plan.

We may disclose your personal information to the following entities:

- our affiliated companies (please see below to learn how you may limit the sharing of some of this information for marketing purposes by our affiliated companies);
- non-affiliated third parties that perform services, such as marketing or market research, on our behalf (for example, we may provide your name, address, phone number, or e-mail address to third parties that send e-mail or regular mail on our behalf);
- non-affiliated third parties that service, maintain, or process your transactions and accounts (for example, companies that provide administrative, telecommunications, computer, trade execution, payment, and securities clearing services, and that prepare and mail account statements and transaction confirmations and other services in connection with the operation of our business);
- non-affiliated third parties as permitted or required by law to defend our rights or enforce a contract, or to cooperate with government agencies or regulators, (including for tax purposes), securities exchanges, self-regulatory bodies (such as FINRA and NFA) and law enforcement officials (for example, for reporting suspicious activity or transactions);

- non-affiliated third parties to protect against actual or potential fraud or unauthorized transactions, and to protect the security of our records and systems, unless prohibited by law;
- non-affiliated third parties at your direction or for which you provide your express consent (for example, banking or financial institutions and professional service providers);
- non-affiliated third parties in connection with Sunrise Capital Management LLC's provision of services to employee stock plan sponsors, but only in connection with activities associated with your Sunrise Capital Management LLC Stock Plan account; and
- non-affiliated third parties in connection with the proposed or actual financing, insuring, sale, securitization, assignment, or other disposal of all or part of our business or assets (including accounts) for the purposes of evaluating and performing the proposed transaction.

We require that commercial entities (as described above) with which we share your personal information agree to keep your information confidential. We also prohibit those entities from using or disclosing your information except for a limited purpose and to the persons for whom disclosure was intended, or as otherwise permitted or required by law. Service providers to whom we disclose personal information must agree to contractual requirements consistent with our privacy and security policies. We prohibit our service providers from using personal information except for the specific purpose for which we provide to them, and we require them to comply with legal obligations applicable to the personal information at issue.

How we share information about you within

We may share personal information about you with various SCM corporate affiliates including internal service providers which perform, for example, printing, mailing, and data processing services.

Additionally, if you interact with Sunrise Capital Management LLC directly as an individual investor (including joint account holders) or if SCM provides services to your employer or plan sponsor, we may exchange certain information about you with SCM financial services affiliates, such as our brokerage and insurance companies, for their use in marketing products and services as allowed by law.

Information collected from investment professionals' customers is not shared with SCMAffiliates for marketing purposes, except with your consent and as allowed by law.

Your Digital Privacy

Privacy, security, and service in Sunrise Capital Management LLC online operations are just as critical as in the rest of our business. We use firewall barriers, encryption techniques and authentication procedures, among other controls, to maintain the security of your online data and to protect Sunrise Capital Management LLC accounts and systems from unauthorized access.

Additional information

If you are a former customer, these policies also apply to you; we treat your information with the same care as we do information about current customers.

Sunrise Capital Management LLC offers several options for accessing and, if necessary, correcting your account information. You can review your information using your statements, or through our Broker website. You may also write or call us with your request for information.

Sunrise Capital Management LLC employs physical, electronic, and procedural controls to safeguard your information. For example, SCM authorize access to your personal and account information only for personnel who need that information in order to provide products or services to you.

Sunrise Capital Management LLC does not disclose any non-public personal information about you, except as permitted by law. For example, SCM has entered into a number of arrangements with our brokerage to provide for investment management, distribution and servicing of the accounts.

In addition, our firm will review our plan annually to modify it for any changes. If the plan is modified, we will promptly post the revised summary on our Website at <https://www.sunrisecapital.us/>. If you have questions about our Privacy Policy or would like a written copy of the policy, you can contact us at (360)-550-6372.

Last updated: July 15, 2015