

Orcus Investment Advisors, LLC
Privacy Policy Statement

FACTS

WHAT DOES ORCUS INVESTMENT ADVISORS, LLC DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers (our clients and prospective clients) the right to limit some but not all sharing. Federal law requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The firm collects personal information about consumers from the following sources:

- ✓ information provided to us for their investment recommendations
- ✓ information provided through engagement agreements and other documents completed in connection with the engagement
- ✓ information provided verbally, and
- ✓ information received from service providers, such as custodians, about investment account transactions.

How?

Financial companies often need to share consumers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their consumers' personal information, the reasons Orcus Investment Advisors, LLC chooses to share, and whether you can limit this sharing.

Reasons we can share your personal information	Does Orcus Investment Advisors, LLC share?	Can you limit this sharing?
For our everyday business purposes -- such as to process your transactions, maintain your account(s), respond to court orders or legal investigation	Yes	No
For our internal marketing purposes -- to offer our services to you	Yes	No
For joint marketing with other financial companies	No	Yes
For our affiliates everyday business purposes -- information about your transactions and experiences	No	Yes
For our affiliates to market to you	No	Yes
For non-affiliates to market to you	No	Yes

What we do

How does Orcus Investment Advisors, LLC protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with state or federal law, as appropriate. These measures include computer safeguards and secured files and buildings. We also maintain procedural safeguards to protect your personal information.

How does Orcus Investment Advisors, LLC collect my personal information?

We collect your personal information:

- ✓ When you engage our advisory firm
- ✓ When you use a check to pay our firm

We do not collect your personal information from others such as credit bureaus, affiliates, or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only:

- ✓ Sharing for affiliates' everyday business purposes
- ✓ Affiliates from using your information to market to you
- ✓ Sharing for non-affiliates to market to you

State laws and individual companies (i.e., your insurance company, etc.) may give you additional rights to limit sharing.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and non-financial companies.

✓ *Orcus Investment Advisors, LLC has an affiliate but does not share.*

Non-Affiliates

Companies not related by common ownership or control. They can be financial and non-financial companies.

✓ *We do not share information with non-affiliates.*

Joint Marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

✓ *We do not engage in joint marketing.*

We will provide you with our privacy policy on an annual basis and at any time, in advance, if our firm privacy policies are expected to change.

Orcus Investment Advisors, LLC

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