

JantzMorgan

Quantitative Investment Management

Privacy Policies

This statement of Jantz Morgan LLC's Privacy Policies presents policies and procedures designed protect our clients' personal privacy.

Jantz Morgan is an investment management company founded on the premise that superior quantitative models will significantly outperform human experts over the long term. The firm's proprietary models combine System Dynamics and other quantitative methods with sound financial principles to create improved investment opportunities. The firm's objective is to provide its clients with total return at an acceptable level of asset volatility in a diversified portfolio. We aspire to do all this while being a socially responsible enterprise that is respectful of our client's values.

Jantz Morgan, LLC is committed to safeguarding the confidential information of our clients at all times. We understand that our clients provide us with confidential information and expect privacy and security for their personal and financial affairs. Jantz Morgan expects nothing less.

Unfortunately, no one can unconditionally guaranty that information will not be compromised by illegal activities of determined hackers or thieves. Nevertheless, Jantz Morgan will take all commercially responsible and prudent steps necessary to safeguard confidential information that has been entrusted to us. The following privacy policy disclosure outlines Jantz Morgan's practices regarding nonpublic information for our existing and potential clients.

This Privacy Policy applies to all existing and former Jantz Morgan clients.

Type of Information Collected

Jantz Morgan LLC collects information about our clients to administer and supervise their account, to provide customer service and to fulfill legal and regulatory requirements. Any collection of personal information is to support our normal business operations and to service our clients' accounts.

The personal and financial information Jantz Morgan collects comes primarily from the account applications or other forms and materials submitted to Jantz Morgan during the course of our relationship with our clients. Some of the personal and financial information Jantz Morgan LLC collects may include:

- name and address,
- information regarding client transactions with us, and

- a personal identifier such as, depending on the client's country of residence, a Social Security number, a National Insurance Number, a Tax File Number, etc.

Information Disclosed to Third Parties

Account information and personal data is maintained by Jantz Morgan in order to fulfill our legal and regulatory requirements. As a general rule, Jantz Morgan will not disclose personal information to any third party except:

- with client permission,
- as is necessary in order to process transaction in the account,
- as required by law,
- as is necessary to defend against charges of wrongdoing by a client, or
- in connection with a civil dispute between Jantz Morgan and a client.

Under no circumstances does Jantz Morgan sell our clients' names or other information to anyone.

Safeguarding Customer Information

Jantz Morgan, LLC undertakes the following steps in order to safeguard customer nonpublic information:

- limit the nonpublic information we collect and store to that which is necessary to administer and supervise client accounts,
- restrict access to clients' nonpublic personal information to those employees who need to know that information in order to provide services to our clients,

- client data and correspondence is backed-up periodically and stored in a separate and secure location,
- use firewalls and virus protection on computers that store nonpublic client information, and
- require companies with which we share customer information to maintain the confidentiality of that information.

These procedural safeguards ensure compliance with our own policy, industry practices and federal or state regulations.

Closed or Inactive Accounts

Jantz Morgan will store account information for at least five years on closed or inactive accounts. Additionally, Jantz Morgan will adhere to the privacy policies and procedures as described in this notice on all closed or inactive accounts.

Complaint Notification

Complaints should be directed to:

Sean Morgan
President and Chief Compliance Officer
Jantz Morgan
470 Atlantic Avenue
4th Floor
Boston, MA 02210

Changes to this Privacy Policy

Jantz Morgan, LLC reserves the right to change this Privacy Policy at any time without notice. This Privacy Policy will be reviewed by the Chief Compliance Officer at least annually for its adequacy and effectiveness of implementation. If we make any substantial changes in the way we use or disseminate clients' nonpublic information, Jantz Morgan will notify our clients. Additionally, as is required by law, Jantz Morgan will reaffirm this policy annually in writing to existing clients.

If you have any questions regarding this Privacy Policy, please write us at:

Jantz Morgan LLC
470 Atlantic Avenue
4th Floor
Boston, MA 02210

Or e-mail us at:

Info@JantzMorgan.com
