



Privacy Policy

The Adviser does not share any nonpublic personal information with any nonaffiliated third parties, except in the following circumstances:

1. As necessary to provide the service that the client has requested or authorized, or to maintain and service the client's account;
2. As required by regulatory authorities or law enforcement officials who have jurisdiction over the Adviser or as otherwise required by any applicable law; and
3. To the extent reasonably necessary to prevent fraud and unauthorized transactions.

The Adviser's officers and employees ("Adviser Personnel") are prohibited, either during or after termination of their employment, from disclosing nonpublic personal information to any person or entity outside the Adviser, except under the circumstances described above. Adviser Personnel are permitted to disclose nonpublic personal information only to such other Adviser Personnel who need to have access to such information to deliver our services to the client.

Security of Client Information

The Adviser restricts access to nonpublic personal information to Adviser Personnel who need to know such information to provide services to shareholders. Any Adviser Personnel who are authorized to have access to nonpublic personal information are required to keep such information in a secure compartment or receptacle on a daily basis as of the close of business each day. All electronic or computer files containing such information shall be password secured and firewall protected from access by unauthorized persons. Any conversations involving nonpublic personal information, if appropriate at all, must be conducted by Adviser Personnel in private, and care must be taken to avoid any unauthorized persons overhearing or intercepting such conversations.

Privacy Notices

The Adviser will provide each consumer with an initial notice of the Adviser's privacy policy at the earlier of the time Part II of the Adviser's Form ADV is delivered or an account is established. The Adviser also shall provide each customer with a new notice of the Adviser's current privacy policy at least annually. If, at any time, the Adviser adopts material changes to its privacy policy, the Adviser shall provide each customer with a revised notice reflecting the new privacy policies. The Chief Compliance Officer is responsible for ensuring that required notices are distributed to consumers and customers. If the Adviser maintains a web site, the privacy policy and the notice will be posted to the site.

Disposal of Nonpublic Personal Information

The Adviser will shred, deliver to a document destruction firm, or other render illegible hard copies of any customer or consumer nonpublic personal information in its possession when the Adviser deems possession of the information to no longer be necessary.

Nonpublic personal information stored on disk, CD, tape or other electronic media shall be cleared, purged, declassified, overwritten and/or encrypted in such a manner so that any information contained therein cannot be restored or decrypted. After the electronic media is cleared, purged, declassified, overwritten or encrypted, the Chief Compliance Officer shall check that the original information is not backed-up or saved on a hard drive, recycle bin or other memories.

The Chief Compliance Officer shall require that each third-party service provider engaged by the Adviser which necessarily obtains access to Advisory Client nonpublic personal information during the course of their services on behalf of the Adviser to adopt similar policies and procedures relating to the secure disposal of nonpublic personal information.

Investors should carefully consider the investment objectives, risks, charges and expenses of the funds before investing. The prospectus contains this and other information about the funds. Read carefully before investing. Investors may obtain a copy of the prospectus by calling 844-223-8637. Distributed by Northern Lights Distributors, LLC. (Member FINRA).