

22.0 PRIVACY POLICY PROCEDURES

AGA is committed to safeguarding the confidential information of its Clients. We hold all personal information provided to us in the strictest confidence. These records include all personal information that AGA collects from Clients in connection with any of the services provided by AGA.

AGA may use financial and other information that the Client or their designated representatives provide AGA to help them meet their personal financial goals while guarding against any real or perceived infringements of their rights of privacy.

22.1 Client Privacy Procedures

AGA has set forth the following procedures to safeguard client privacy:

- AGA shall not sell client information to anyone.
- AGA will restrict access to clients' personal information to individuals within AGA who require the information in the ordinary course of servicing clients' accounts. Client information is used only for business purposes.
- AGA has developed procedures to safeguard client records and information.
- Client information may only be given to third-parties under the following circumstances:
 - To broker/dealers to open a client's brokerage account;
 - To other firms as directed by clients, such as accountants, lawyers, etc.;
 - To regulators, when required by law.
- At times, client information may be reviewed by AGA's outside service providers (i.e. – accountants, lawyers, consultants, etc.). AGA will review the entities' privacy policies to ensure that clients' information is not misappropriated or used in a manner that is contrary to AGA's privacy policies.
- AGA shall provide a privacy notice to clients (i.e. "natural persons") upon inception of the relationship and annually thereafter. AGA will maintain a record of the dates when the privacy notice is provided to clients.
- In the event of a change in the privacy policy, AGA will provide its clients with a sufficient amount of time to opt out of any disclosure provisions.
- Any suspected breaches to the privacy policy should be reported to the CCO.
- If an employee receives a complaint regarding a potential identity theft issue (be it from a client or other party), the employee should immediately notify the CCO, who will thoroughly investigate any valid complaint, and maintain a log of all complaints as well as the result of any investigations.

- In the event that unintended parties receive access to personal and confidential information of California residents, AGA will disclose those clients of the privacy breach. See Senate Bill No. 1386.
- The CCO will monitor for compliance with AGA's Privacy Policy and will coordinate the dissemination of the Privacy Notice. The CCO will maintain records of all clients that are to receive AGA's privacy notice.

22.2 Outside Contractors

AGA may, as necessary, use various services from nonaffiliated third parties for the purpose of supporting the financial products and services we provide to Clients. These parties must agree to strict confidentiality in AGA's agreements with them and AGA expects them to keep all information private.

We do not provide Clients' personally identifiable information to mailing list vendors or solicitors for any purpose.

22.3 Maintenance of Records

Personally identifiable information about a Client will be maintained during the time they are a Client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of record retention, all such information will be destroyed.

22.4 Requests for Information

Upon Client request AGA shall deliver within a reasonable time a current copy of AGA Privacy Policy. A log of requests and deliveries will be maintained.