

Privacy Policy

Breakwater Asset Management, LLC, ("BAM") an independent registered investment advisory firm, committed to safeguarding the confidential information of its clients and to protect your privacy. We hold all personal information provided to our firm in the strictest confidence. The following information is provided, as required by law, to help you understand our privacy policy and how we will handle and maintain confidential personal information as we fulfill our obligations to protect your privacy. "Personal information" refers to the nonpublic financial information obtained by BAM in connection with carrying out our services.

Information We Collect

Breakwater Asset Management collects personal information as part of our relationship to you, to provide client services and fulfill legal and regulatory requirements. The type of information BAM collects may include:

- Information BAM reported to us by you (such as name, address, Social Security number, profile documents, assets and income);
- Information you provide BAM directly about your personal finances or personal circumstances or which BAM may receive from brokerage statements or other information you authorize BAM to receive; and
- Transaction based information.

Information Disclosed In Administering Products and Services

BAM will not disclose personal information about current or former clients to non-affiliated third parties except as permitted or required by law. BAM does not sell any personal information about you to any third party. BAM will not disclose personal information without your authorization, except as required or permitted by law.

Procedures to Protect Confidentiality and Security of Your Personal Information

BAM has procedures in place that limit access to personal information to those employees who need to know such information in order to perform business services. In addition, BAM maintains physical, electronic and procedural safeguards to guard your nonpublic personal information.

BAM will update its policy and procedures when necessary to ensure that your privacy is maintained and that BAM conducts business in a way that fulfills our commitment to you. If BAM makes any material changes in its privacy policy, we will make that information available to clients through our Web site and/or other communications. Outdated personal information will be securely maintained for the period of time required by law and will be destroyed thereafter. If you end your relationship with us, we will continue to adhere to the policies and practices described in this notice.

Please contact us at 603-918-1631 with any questions.