

JULEX CAPITAL MANAGEMENT LLC PRIVACY POLICY

JULEX CAPITAL MANAGEMENT LLC (“JULEX”), an independent investment advisory and management firm, is committed to safeguarding the confidential information of its clients. The firm holds all personal information provided by and collected from its clients in the strictest confidence. JULEX never discloses information to nonaffiliated third parties, and does not anticipate doing so in the future. In accordance with M.G.L. c.110A, the firm will not share non-public personal information with non-affiliated third parties unless a client has opted in of certain sharing through a signed statement in which the client makes an affirmative declaration of permission to disclose such information. JULEX uses financial information that clients provide to help them meet their personal financial goals while guarding against any real or perceived infringements of their rights or privacy. The firm’s policy with respect to personal information is listed below.

JULEX limits employee and agent access to information only to those who have a business or professional reason for knowing, and only to non-affiliated parties as permitted by law. (For example, federal regulations permit the firm to share a limited amount of information about clients with a brokerage firm in order to execute transactions on their behalf.) If JULEX is required to discuss a client’s financial situation with any other professional retained by the client, such as an accountant or lawyer, we will obtain the client’s permission before doing so.

The firm maintains a secure office and computer environment to ensure that client information is safe.

The categories of nonpublic personal information that is collected from a client depend upon the scope of the client engagement. It will include information about personal finances, and information about transactions between the client and third parties. For unaffiliated third parties that require access to client personal information, including financial service companies, consultants and auditors, JULEX also requires the strictest confidentiality in its agreements with them. Federal and state regulators may also review these records as permitted by law.

JULEX does not and will not provide client information to vendors or solicitors for any purpose.

Personal identifiable information about our clients will maintained during the time they are a client, and for the required time thereafter that is required by law. After this time, all such information will be carefully destroyed.