

Privacy Notice - Vistia Capital

August 2025

Privacy Notice

Vistia Capital, LLC respects your right to privacy and recognizes our responsibility for protecting the privacy and security of the personal information we receive from you. We have always been committed to securing the confidentiality and integrity of your personal information. We are proud of our privacy practices and want our current and prospective customers to understand what information we collect and how we use it.

Why We Collect Your Information

We gather information about you so that we can (i) know who you are and thereby prevent unauthorized access to your information, (ii) design and improve the services we offer and (iii) comply with the laws and regulations that govern us.

What Information We Collect

We may collect the following types of 'nonpublic personal information' about you:

- Information about your identity, such as your name, address and social security number;
- Information about your transactions;
- Information about your personal financial profile, such as your risk tolerance levels, goals and objectives, assets, liabilities, savings and investments.

What Sources We Obtain Your Information From

We collect nonpublic personal information about our clients such as you from the following sources: •

- Information we receive from you on contracts or other forms; such as risk tolerance questionnaires and/or investment policy statements.
- Information about your transactions with our affiliates, or others.
- If you visit our website, information we collect via a web server, is often referred to as a cookie. Cookies indicate where a site visitor has been online and what has been viewed.

What Information We Disclose

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except to affiliates, as permitted or required by law, or for regulatory compliance. Moreover, we will not release information about our customers or former customers unless one of the following conditions is met:

- We receive your prior written consent.
- We believe the recipient to be you or your authorized representative.
- We are required by law to release information to the recipient.

Opt-Out Provisions

We have taken steps to assure that all third-party vendors have confidentiality clauses to protect your information. Should we not have such written agreements in place, then you have the option to “opt-out” of the sharing of this information. If you desire to opt out of receiving marketing material from us or those instances that we do not have the confidentiality clause, you should provide us with written instructions forwarded to Chief Compliance Officer at the address set out below. Additionally, the law allows you to “opt out” of only certain kinds of information sharing with third parties. As mentioned above, we do not share personal information about you with any third parties that trigger this opt-out right. This means you are already opted out of those sharing situations.

California Privacy Rights

California customers are entitled to request information relating to whether a business has disclosed personal information to any third parties for the third parties’ direct marketing purposes. That notice will identify the categories of information shared and will include a list of the third parties and affiliates with which it was shared, along with their names and addresses. If you are a California resident and would like to make such a request, please submit your request in writing at the address information below.

Confidentiality and Security

We maintain physical, electronic and procedural safeguards to guard your personal information. We also restrict access to your personal and financial data to our authorized associates who have a need for these records. We require all nonaffiliated organizations and vendors to keep client data confidential and use appropriate security measures to protect it. They must also be contractually obligated to keep the information provided confidential and used as requested. Furthermore, we will continue to adhere to the privacy

policies and practices described in this notice even after your account is closed or becomes inactive.

Changes to Our Privacy Notice

We will continue to conduct our business in a manner that conforms to our pledge to you, your expectations and all applicable laws; however, our policy about obtaining and disclosing information may change from time to time. We will provide you with notice of any material change to this policy before we implement the change.

To Contact Us

If you have questions regarding our privacy policy, please contact us at [720.738.1740](tel:720.738.1740) or support@vistia.com.

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