



DIVIDEND ASSETS CAPITAL, LLC

INVESTMENT ADVISORS

Privacy Notice

Dividend Assets Capital, LLC (“DAC”) considers client privacy to be a fundamental aspect of its relationship with clients and is committed to safeguarding all client related “personal” information as defined under the privacy rules published under Section 504 of the Gramm-Leach-Bliley Act, as amended. DAC does not disclose non-public personal information concerning its clients, former clients, to any other party or person except as permitted and/or required by law, an applicable regulatory authority, or as outlined below.

DAC may have, in limited circumstances, the need to collect non-public personal information about its clients. This information may include but is not limited to:

- Name, address, telephone number, tax identification and verification;
- Assets, income, bank and investment accounts, credit information, custodian, IRS tax status and/or other specific financial, investment or related information;
- Application, subscriptions, suitability and similar forms or questionnaires; and
- Legal documents such as trust agreements, financials, ownership records or similar information.

DAC may collect personal information when an individual account is opened or when the information is provided by that client’s advisor. This material may be accumulated from sources such as account applications and related documents, other written, electronic or verbal correspondence, transactions, a brokerage or financial advisory firm, financial adviser or consultant, and/or information captured on DAC’s internet web site. DAC retains the personal information of current and former clients in accordance with Rule 204-2 of the Investment Advisers Act of 1940.

DAC may share client information with its affiliates or subsidiaries as needed to conduct business. From time to time, DAC may engage the services of third-party vendors or consultants to assist with the management of client portfolios. In that respect, information will be provided on a need-to-know basis only and the external parties will agree to hold all such information confidential. DAC may also disclose or share information, to the extent permitted by law, with other financial institutions with which the firm and/or its clients have a joint business arrangement in managing and/or servicing the client.

DAC’s procedures are designed to restrict access to non-public personal information to appropriate personnel. DAC maintains physical, electronic and procedural safeguards that comply with federal standards to safeguard current and past client-related personal information.

DAC does not sell non-public personal information to any external source and does not distribute this information to unrelated third-party providers unless necessary for business related purposes in connection with the servicing and management of client assets. DAC cannot guarantee, however, clients against information theft that is beyond its reasonable technological abilities and controls.

Clients are provided with DAC’s Privacy Notice at the time their account is incepted and annually thereafter until the account is closed. DAC reserves the right to periodically review and revise its Privacy Notice and provides updates annually and/or when materially amended. At all times, a client may notify DAC in writing to restrict all non-public personal information from being distributed (except to regulators and/or by law) to any external parties including affiliates, consultants, and client related financial advisors. Clients are forewarned, however, that doing so may severely inhibit DAC’s ability to properly manage the client’s assets and/or appropriately conduct business on behalf of the client. Please direct any questions or concerns to DAC Compliance at 58 Riverwalk Boulevard, Ridgeland SC 29936, or 843-645-9700.