



PRIVACY POLICY

VII Peaks Capital, LLC (the “*Company*,” “*our*,” “*us*,” or “*we*”) is committed to protecting your privacy. This privacy notice, which is required by state and federal law, explains the privacy policies of the Company and its affiliated companies. This notice supersedes any other privacy notice you may have received from the Company, and its terms apply both to our current customers and to former customers as well.

How We Protect Your Personal Information

We are committed to maintaining the privacy of our stockholders and to safeguarding their non-public personal information. We will safeguard, according to strict standards of security and confidentiality, all information we receive about you. With regard to this information, we maintain physical, electronic, and procedural safeguards that comply with federal and state standards.

What Kind of Information We Collect

Generally, we do not receive any non-public personal information relating to our stockholders, although certain non-public personal information of our stockholders may become available to us. In general, the only information we collect from you is your name, address and number of shares you hold.

How We Use this Information

This information is used only so that we can service your account, send you annual reports and other information about the Company, and send you proxy statements or other information required by law.

Who Has Access to Personal Information

We do not share customer information with any non-affiliated third party except as described below.

- **Authorized Employees of Company.** It is our policy that only authorized employees of the Advisor who need to know your personal information will have access to it.
- **Service Providers.** We may disclose your personal information to companies that provide services on our behalf, such as record keeping, processing your trades and mailing information to you. These companies are required to protect your information and use it solely for the purpose for which they received it.
- **Courts and Government Officials.** If required by law, we may disclose your personal information in accordance with a court order or at the request of government regulators or



exchange officials. Only that information required by law, subpoena, rule, regulation or court order will be disclosed.

Updating Your Information

To help us keep your customer information up-to-date and accurate, please contact the Company, at the address below, if there is any change in your personal information.

VII Peaks Capital, LLC
4 Orinda Way, Suite 125-A
Orinda, CA 94563
ATTN: Chief Compliance Officer