

CABLE CAR CAPITAL LLC

PRIVACY POLICY

Cable Car Capital LLC (“Adviser”) treats the maintenance and protection of client and prospective client personal information as an integral part of its responsibilities. As required by SEC Regulation S-P, Adviser has adopted policies and procedures to safeguard nonpublic personal information it may receive in the course of operating its website at www.cablecarcapital.com and conducting its investment advisory business.

This policy shall be provided to clients upon establishment of a business relationship with Adviser, as well as at least once during any period of 12 consecutive months during the relationship. This policy will also be available on Adviser’s website.

Adviser may collect non-public personal information from clients and prospective clients, including but not limited to:

- Name, address, and contact information
- Tax ID and/or social security number
- Investment objectives and experience
- Financial circumstances and employment status
- Account balances and transaction records

As described in Adviser’s advisory agreement, Adviser’s client relationships are confidential. Adviser shall not disclose any information about current or prospective clients or clients’ account(s) to any third party, unless required by law or expressly authorized, except as described below. For the purposes of this policy, representatives of clients’ appointed custodian(s) and the principals, affiliates, and related persons of Adviser will not be considered third parties.

From time to time and in its ordinary course of business, Adviser may share aggregated customer information, such as the total volume of assets under management and number of clients, with regulatory authorities and service providers. Adviser may also be required to share individual client information with outside service providers such as transfer agents, accountants, attorneys, and administrators in the course of providing its investment advisory services to clients.

Adviser takes steps to prevent access to Client information from any party who should not have access to it by securing nonpublic personal information at its place of business and on password-protected servers maintained by unaffiliated service providers. Adviser believes the servers of its hosting and backup providers to be secure; however, it disclaims responsibility for any breach of security that may occur due to theft or misfeasance, errors, omissions, or failures by unaffiliated parties.

Adviser’s website utilizes cookies and certain Google Analytics features, such as demographic and interest reporting and remarketing. Adviser will not facilitate the merging of personally-identifiable information with non-personally identifiable information without prior affirmative consent. To opt out of Google Analytics tracking, visit <https://tools.google.com/dlpage/gaoptout/>.

Adviser will under no circumstances sell client information to anyone.

