

Kovitz Privacy Notice

This privacy policy applies to current or former clients, customers, consumers and investors of: Kovitz Investment Group Partners, LLC; Kovitz Securities, LLC; New Millennium Fundamental Hedged Equity, L.P.; and New Millennium Fundamental Hedged Equity QP, L.P. (hereinafter collectively referred to as the “Kovitz Companies”).

How do the Kovitz Companies handle your personal information?

Why? Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What? Nonpublic personal information means that information about you that we collect in connection with providing a financial product or service to you. Nonpublic personal information does not include information that is available from public sources, such as telephone directories or government records.

The types of personal information we collect and share depends on the product or service we provide to you. This information can include.

- Your name, address, and Social Security number;
- Your assets, income, and similar information;
- Information about your transactions with us, our affiliates, or others, such as your account balance(s) and payment history (for example, check-writing activity or wire transfers);
- Transaction, website navigation, and optional survey information collected from internet products and services such as a Kovitz Companies website;
- Information we receive from consumer reporting agencies, such as credit relationships and credit history.

How? All financial companies need to share all or a portion of the above personal information to run their everyday business. In the section below, we list the reasons financial companies can share such personal information, the reasons the Kovitz Companies choose to share, and whether you can limit this sharing:

Reasons we can share your personal information	Do the Kovitz Companies share this information?	Can you limit this sharing?
<p>For our everyday business purpose – such as:</p> <ul style="list-style-type: none"> • to administer your accounts; • to process transactions requested by you; • to provide financial products or services; • to evaluate your investment needs; • to identify other products or services that may interest you; • to determine your eligibility for products; • to collect or report debts owed to us, and to protect our rights and property; • to respond to regulatory inquiries 	Yes	No
<p>For our marketing purposes – to offer our products and services to you</p>	Yes	Yes
<p>For joint marketing with other financial companies</p>	<p>No. The Kovitz Companies do not sell or share personal information with non-affiliated companies for the purpose of marketing their products or services to you.</p>	Not applicable
<p>For our affiliates’ everyday business purposes – information about your transactions and experiences</p>	Yes	No
<p>For our affiliates’ everyday business purposes – information about your creditworthiness</p>	Yes	No
<p>For nonaffiliates to market to you</p>	<p>No. The Kovitz Companies do not sell or share personal information with non-affiliated companies for the purpose of marketing their products or services to you.</p>	Not applicable

<p>To limit our sharing, or if you have questions:</p>	<p>Contact: Steve Hengst, CCO 115 S. LaSalle St., 27th Floor Chicago, IL 60603 (312) 334-7300</p> <p>Please note: if you are a <i>new</i> customer, we can begin sharing your information upon providing this notice to you (typically, this is in connection with sending new account paperwork to you). When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
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Who we are

Who is providing this notice?	The Kovitz Companies
What we do	
How do the Kovitz Companies protect my personal information?	All employees of the Kovitz Companies are instructed to use strict standards of care regarding the confidentiality of your nonpublic personal information as outlined in firm policies. We maintain physical, electronic, and procedural safeguards that comply with applicable laws to protect your nonpublic personal information, and restrict access to those employees who need access to provide financial products and services to you. Employees not adhering to our firm policies are subject to disciplinary action. We intend to verify that non-affiliated companies and independent contractors to whom we provide your nonpublic personal information implement procedures to protect the privacy of your nonpublic personal information or otherwise enter into confidentiality agreements that restrict the use of the information to the intended purposes.
How do the Kovitz Companies collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> • open an account with the Kovitz Companies; • deposit/ withdraw funds to/from your account(s); • use internet products and services (such as a Kovitz Companies website)
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes – information about your creditworthiness; • affiliates from using your information to market to you; • sharing for non-affiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
What happens when I limit sharing for an account I hold jointly with someone else?	This will limit the sharing of your personal, non-public information, but will not limit the sharing of the non-public information of the joint account holder(s).
Definitions	
Affiliates	The Kovitz Companies (as described at the beginning of this notice)
Non-Affiliates	The clearing firm/custodian/IRA trustee for Kovitz Securities, LLC, and other independent, third party contractors which allow us to provide you with performance and transaction summary information, or which perform administrative or marketing services on our behalf. <p>Kovitz Investment Group Partners, LLC, and Kovitz Securities, LLC are affiliates of Focus Financial Partners, LLC (“Focus”). We and other affiliates of Focus share certain of your personal information with an unaffiliated third party for the purpose of aggregating it and providing summary information based on this data to our parent company, Focus.</p>