

Privacy Policy for Gambit Capital Management, LLC

As of June 28, 2024



GAMBIT CAPITAL MANAGEMENT, LLC

Gambit Capital Management, LLC recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. Gambit Capital Management, LLC will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information. Gambit Capital Management, LLC will provide the privacy statement to all clients annually.

We want our clients to understand what information we collect, how we use it, and how we protect your personal information.

Why We Collect Your Information

We gather information about you so that we can:

- Help design and implement the investment and planning related services we provide you; and
- Comply with the Federal and State laws and regulations that govern us.

What Information We Collect and Maintain

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

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information.
- Information that we generate to service your financial needs.
- Information that we may receive from third parties with respect to your financial profile.

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We collect your personal information, for example, when you

- open an account or give us your income information
- tell us about your portfolio or deposit money
- enter into an investment advisory contract

We also collect your personal information through the following communication methods: email, text messages, client meetings, and from others, including affiliates and other companies.

What Information We Disclose

We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. For example, in order for us to provide planning or investment management services to you, we may disclose your personal information in limited circumstances to various service providers, such as our clearing firm or independent contractors hired by Gambit Capital Management, LLC. If the Investment Adviser leaves Gambit Capital Management, LLC to join another firm, he or she may be permitted to retain copies of client information so that they can assist with the transfer of client accounts and continue to serve the client at their new firm.

“Opting-Out” of Third Party Disclosures: If you do not want your Investment Adviser to retain copies of your client sensitive information when he or she leaves us to join another firm, you may contact us by calling (651) 427-9001.

Otherwise, Gambit Capital Management, LLC will not disclose any personal information about you or your account(s) unless one of the following conditions is met:

- We receive your prior written consent; or
- We have documentation that the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient

Arrangements with companies or independent contractors not affiliated with Gambit Capital Management, LLC will be subject to confidentiality agreements.

How We Protect Your Personal Information

Privacy has always been important to Gambit Capital Management, LLC. We restrict and limit access to client information only to those who need to carry out their business functions. We maintain physical, electronic, and procedural

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safeguards to protect your confidential personal information.

SMS Campaign

We may request you provide us with your phone number through multiple communication methods including on our website form. With your consent we may send you text messages. The context of messages varies. Message and data rates may apply. Message frequency varies. Reply STOP at any time to unsubscribe from text messages.