

While information is the cornerstone of our ability to provide service, our most important asset is our client's trust. Keeping information secure and using it only as our clients would want us to, is a top priority for New Frontier Advisors LLC. Federal law requires us to tell you how we collect, share, and protect your personal information.

In providing asset management services to you, we have access to personal information about you. Our policy is to only collect necessary information and to strictly safeguard what information we do collect, only using or disclosing it as needed to provide services to you or as required by law. This is applicable to information for current and former clients.

What information do we have access to and share while servicing your accounts? We have access to Social Security Numbers, birth dates, account numbers, transaction history, financial history, personal addresses, phone numbers, and email addresses.

How does New Frontier Advisors collect my personal information? We collect your personal information when you engage us as a sub-advisor or money manager for your account. We also can collect information from your custodian once you have engaged us as a sub-advisor or money manager.

Reasons we might collect or share your personal information: We limit the collection and use of client information to that information we require to deliver superior service to our clients, which includes advising our clients about our products, services and other opportunities, and to administer our business. We will not reveal client information to any external organization, without your express permission, with the following exceptions: i) Those necessary to effect or administer a transaction in connection with a client's trading account, such as a custodian of your account; ii) Our accountants or lawyers if necessary; iii) Regulatory authorities or law enforcement as requested or required by law; and, iv) Organizations we hire to provide support services, which will be required to maintain privacy standards substantially similar to those herein and meet or exceed applicable law.

New Frontier does not share your personal information for marketing purposes with any affiliates or nonaffiliates. An affiliate is a company that is under common ownership or control as New Frontier. We have no affiliates. A non-affiliate is a company that is independent of New Frontier. We engage nonaffiliates to assist in servicing your account but we don't permit them to use the information for marketing purposes.

How does New Frontier Advisors protect my personal information? To protect your personal information from unauthorized access and use, we apply security measures that comply with or exceed federal law. These measures include computer safeguards and secured files and buildings. We do not collect information about financial accounts that we do not manage. Though we have access to personal information that we do not need to manage your accounts, such as phone numbers, at your custodian, we do not collect or use that information in order to limit access points. We permit only authorized employees, who are trained in the proper handling of client information, to have access to that information. Employees who violate our Privacy Policy or the procedures that support it will be subject to our disciplinary process.

Why can't I limit all sharing? Federal law gives you the right to limit the i) sharing for affiliates' everyday business purposes—such as information about your creditworthiness; ii) sharing with affiliates for marketing purposes; and, iii) sharing with nonaffiliates for marketing purposes. State laws and individual companies may give you additional rights to limit sharing. As New Frontier does not share any of your personal information with affiliates or nonaffiliates, there is no sharing to limit.

Questions? Call us at 617-482-1433 or visit us online: at <https://www.newfrontieradvisors.com/contact/>.