

# ***Cambyses Financial Advisors LLC***

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## ***Cambyses' Privacy Policy***

If you are our client, or you are associated with one of our corporate or institutional clients, Cambyses obtains personal information about you. This information permits us to deliver the highest level of service to you.

### **We recognize that you expect us to treat your private information appropriately.**

This policy statement describes the personal information we may collect about you, the purposes for which we use the information, the circumstances in which we may share the information and the steps that we take to safeguard the information and protect your privacy.

### **Where We Obtain Information**

The personal information we collect about you comes primarily from account applications or other forms and materials you submit to us during the course of your relationship with us. We may also collect information about your transactions and experiences when you purchase products and services we provide.

When we provide financial services to you, subject to strict compliance with all applicable laws and regulations, information may be collected about you indirectly from monitoring or other means (e.g. recording of telephone calls and monitoring e-mails). In these circumstances, the information is not accessed on a continuous or routine basis, but may be used for compliance or security purposes.

### **The Information We Have about You**

If you are one of our private clients, a settlor, trustee, or beneficiary of a trust client, or an owner or principal of a company or other investment vehicle established to invest on your behalf or on behalf of your family, we typically collect:

- Your name, address and other contact details;
- Your age, occupation and marital status;
- Extensive financial information, including source of wealth, investment experience and objectives, risk tolerance and, in certain jurisdictions, representations required under applicable law or regulations.
- A photograph from, as applicable, your passport, national identity card, or driver's license as required by laws and regulations addressing money laundering and related matters.
- A personal identifier such as (depending on your country of residence) your Social Security Number, National Insurance Number, or Tax File Number

If you are an employee, officer, director, or principal of one of our corporate or institutional clients, we typically collect:

- Your name and contact details;
- Your role, position, title and area of responsibility; and
- Certain identifying information (e.g. passport photo) as required by laws and regulations addressing money laundering and related matters.

You are not required to supply any of the personal information that we request. However, if you do not provide it we may be unable to open or maintain your account or to provide services to you.

We make every effort to ensure that all information we hold about you is accurate, complete and up to date. Please help us do this by notifying us promptly if your personal information changes.

**Please direct compliance or regulatory inquiries to our CCO: [Steven@CambysesCapital.com](mailto:Steven@CambysesCapital.com)**

# *Cambyses' Privacy Policy*

## **How We Use Your Personal Information**

We use your personal information to:

- Administer, operate, facilitate and manage your relationship and/or account with us. This includes sharing your information internally as well as disclosing it to third parties, as described in the following two sections, respectively;
- Contact you or your designated representative by post, telephone, electronic mail, facsimile, in connection with your relationship and/or account;
- Provide you with information (such as investment research), recommendations, or advice concerning products and services we offer; and
- Facilitate our own business operations, assessing and managing risk, and fulfilling legal and regulatory requirements.

If your relationship with Cambyses ends, we continue to treat your personal information, to the extent we retain it, as described in this policy.

## **Disclosure of Your Personal Information within Cambyses**

To provide efficient and reliable service and to improve product and service options available to you, more than one entity within Cambyses Capital may be given access to, your personal information. When we share your personal information, we adhere to applicable legal and industry standards regarding the protection of personal information.

## **Disclosure of Your Personal Information to Third Parties**

*Cambyses does not sell your personal information. Further, Cambyses shares your information only on your written instruction, if it is necessary in order to transact business in which you have an interest, or as required to comply with the lawful order of a court.*

Cambyses does not disclose your personal information to third parties, except as described in this policy. Third party disclosures may include sharing information with non-affiliated companies that perform support services for your account or facilitate your transactions, including those that provide professional, legal or accounting advice to Cambyses. Non-affiliated companies that assist us by providing services to you are required to maintain the confidentiality of such information to the extent they receive it and to use your personal information only in the course of providing such services and only for the purposes that Cambyses dictates.

We may also disclose your personal information to fulfill your instructions, to protect our rights and interests and those of our business partners or pursuant to your express consent.

Under limited circumstances, your personal information may be disclosed to third parties as permitted by, or to comply with, applicable laws and regulations; for instance, when responding to a subpoena or similar legal process, to protect against fraud and to otherwise cooperate with law enforcement or regulatory authorities or with organizations such as exchanges and clearinghouses.

## **How We Protect Your Privacy and Your Private Information**

Cambyses is committed to protecting the privacy and confidentiality of your personal information. We limit access to your personal information to our authorized employees or agents. As described above in Disclosures of Your Personal Information to Third Parties, we hold our service providers to stringent privacy standards.

We maintain physical, electronic and procedural safeguards to protect your information from loss, misuse, damage or modification, and unauthorized access or disclosure. When we implement information security programs we:

- Design, implement and provide oversight to our information security program;
- Use specialized software and hardware applications to implement firewalls and virus protection;
- Test the security and operability of products and services before we introduce them;
- Scan for publicly known vulnerabilities in the technology;
- Commission internal and external reviews of our sites and services;
- Monitor our system infrastructure to detect weaknesses and potential intrusions;

# *Cambyses' Privacy Policy*

## **How We Protect Your Privacy and Your Private Information (Continued)**

When we implement information security programs we: (continued)

- Implement controls to identify, authenticate and authorize access to our systems or sites;
- Protect information during transmission through various means including, where appropriate, encryption; and
- Provide our personnel with relevant training and continually update our security practices in light of new risks and developments in technology.

## **Other Privacy Policies or Statements**

This statement provides a general overview of the ways in which Cambyses protects your personal information. You may, in connection with specific products or services we offer, be provided with privacy policies or statements that supplement this policy.

## **Changes to Our Policy**

We may change this policy from time to time to reflect changes in our practices concerning the collection and use of personal information. We will provide you a written or electronically transmitted copy of any revised policy. The revised policy will be effective immediately upon transmission or mailing. This version of the Policy is effective May 26, 2019.

## **Review Your Data**

You may access and review any personal data that Cambyses has about you by sending a written request to our Chief Compliance Officer. You will be required to supply a valid means of identification as a security precaution to assist us in preventing the unauthorized disclosure of your personal information. We will process your request within the time provided by applicable law. You are also entitled to have Cambyses modify or delete any information that you believe is incorrect or out of date.

## **We May Call You**

Cambyses may occasionally contact you by post, telephone, electronic mail, or facsimile, with details of products and services that we believe may be of interest to you. If you do not wish to be contacted in this way, if you wish to exercise your rights of correction and access, or if you require further information regarding our privacy policies and practices, please contact: Steven J Roy, Chief Compliance Officer, [818] 489-4228, [steven@cambysecapital.com](mailto:steven@cambysecapital.com), or facsimile at [818] 450-0426.

## **If your Personal Information is Compromised!**

If you suspect you are a victim of fraud or identity theft, the faster you act the better. You immediately need to:

- ⇒ **Contact our Chief Compliance Officer**, [818] 489-4228, [steven@cambysecapital.com](mailto:steven@cambysecapital.com) or by facsimile at [818] 450-0426. We will immediately review your accounts to determine if there is evidence of unauthorized activity.
- ⇒ **Contact your Other Financial Representatives**
- ⇒ **Let the credit bureaus know.**
  - ◇ Equifax—Call **800-525-6285** or visit [www.equifax.com](http://www.equifax.com), or write P.O. Box 740250, Atlanta, GA
  - ◇ 30374.Experian—Call **888-397-3742**, or visit [www.experian.com](http://www.experian.com), or write P.O. Box 9556, Allen, TX 75013.
  - ◇ TransUnion—Call **800-680-7289**, or visit [www.transunion.com](http://www.transunion.com), or write P.O. Box 6790, Fullerton, CA 92634.
- ⇒ **Notify appropriate government agencies**
  - ◇ Visit the FTC's Identity Theft Site at <http://www.ftc.gov/bcp/edu/microsites/idtheft>
  - ◇ Forward suspicious emails to [nophishing@cbbb.bbb.org](mailto:nophishing@cbbb.bbb.org).