

Girard Capital Management

1900 Park West Drive Suite 280

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PRIVACY NOTICE – OPT-IN

Investment advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives customers the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect NPI about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information and Financial Account Numbers and/or Balances, Sources of Income, Credit Card Numbers or other Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisers may need to share NPI to run their everyday business. In the section below, we list the typical reasons that we may share your personal information:

- > For everyday business purposes – such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations, or report to credit bureaus;
- > For business continuity purposes such as the incapacitation/death of the firm's key personnel.

If you are a new customer we may begin sharing your information on the day you sign our agreement. When

you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

PROTECTING CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

FEDERAL & STATE LAW ALLOWS YOU TO LIMIT SHARING – OPTING OUT AND OPTING IN

State law gives you additional rights to limit sharing. Under certain states' laws, we may not share NPI about you with non-affiliates unless you first give us written permission ("opting-in"). If you do not give us permission to share your information, then we are prohibited from sharing this information with non affiliates as defined below.

I give you permission to share my NPI with non-affiliates.

DEFINITIONS: Non-affiliates – companies not related by common

ownership or control. They can be financial and nonfinancial

companies;

Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.