

# Columbia Capital Management, LLC

## **Client Privacy Notice**

Regulations adopted by the Securities and Exchange Commission require that Columbia Capital Management, LLC ("Columbia") notify you of the policies and procedures we have adopted regarding the use and protection of our client's confidential information. Columbia practices a policy of respecting our client's non-public information and continues to maintain the highest level of confidentiality with regard to all information we collect regarding our clients.

Information We Collect: In connection with providing you (the "Client") investment advice, financial advice, or other services, the source of information we collect regarding the Client include:

- Information provided by nonaffiliated third parties such as the Client's accountants, attorneys or other professionals;
- Information supplied through contracts or agreements; and
- Information received directly from affiliated third parties such as institutions providing security brokerage, depository, custodial or safekeeping services for the Client.

Information We Disclose: Although information we obtain in connection with providing our services for the Client may be available to the public upon request, Columbia will only provide Client information when instructed by the Client. In addition, Columbia will only use information regarding the Client's accounts in ways which will assist us in benefiting the Client. This includes disclosing collected information to our affiliates when necessary to perform our normal business activities (i.e. establishing or updating accounts for the Client with security brokerage firms or banks for administration of your accounts and for processing various transactions at the Client's request).

We may share the Client's information with the following individuals to perform our normal business functions:

- Individuals with whom the Client has directed us to speak with (i.e. accountants, auditors, attorneys, or other professionals).
- To government entities or other third parties in response to subpoenas or other legal process as required by law.
- Regulators such as federal or state examiners when we are required to disclose the Client's information by law.
- Accountants and auditors hired by our firm to perform tax work and required annual examinations.

Our Security Policy: Only those individuals who need it to perform their jobs are authorized to have access to confidential client information. We maintain physical, electronic, and procedural security measures that comply with applicable state and federal regulations to safeguard confidential client information.

Closed or Inactive Accounts: If the Client decides to close its accounts or become an inactive client, we will adhere to the privacy policies and practices as described in this notice.

Changes to this Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify the Client.

If you have any questions concerning this Privacy Policy, please contact our office.