

# AGHAZ INVESTMENT ADVISORS, LLC

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## Privacy Policy

Investment Advisers are required by Federal law to inform their clients of their policies regarding privacy of client information. Aghaz Investment Advisors, LLC (“Aghaz” or the “Firm”) appreciates the trust our clients place in us, and we recognize the importance of protecting the confidentiality of non-public personal information that we collect from them through our business relationships. The information is used to ensure accuracy in reporting and record keeping, to perform our regular course of business, and to comply with the law and our regulators.

Keeping this information secure is a top priority for us, and we are pleased to share with you our Privacy Policy:

1. We collect non-public personal information about our clients from the following sources:
  - a. Applications (e.g., brokerage account applications)
  - b. Our Investment Management Agreement
  - c. Records of accounts under our management
  - d. Other forms, correspondence, and communications
2. The information we collect can include:
  - a. Name, address, social security number, and date of birth
  - b. Assets, income, and investment objectives
  - c. Transactions and investments with us (account values, transactions, etc.)
  - d. Other information useful to our services
3. We maintain administrative, physical and electronic safeguards to protect non-public personal information.
4. We may disclose non-public personal information about our clients and former clients to employees, independent contractors, or other third parties with whom we have contracted to perform services on our behalf, such as brokerage, legal, accounting, compliance, and data processing services, as well as in order to comply with legal and regulatory requests made to us, and to assist with law enforcement, investigations, complaints, regulatory requests, litigation, arbitration, mediation, and other legal processes.
5. Note that our Privacy Policy includes no right to disseminate non-public personal information about our clients and former clients to any external or third party for marketing or other purposes not directly related to servicing your account.
6. We may disclose non-public personal information about our clients and former clients as required by Federal, state, or local law. We will provide notice of changes in our information sharing practices. If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so you will have the opportunity to opt-out of such disclosure.

### Other Important Information:

- For California residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by law. We will not share information about your creditworthiness with our affiliates, as applicable, other than as permitted by California law, unless you authorize us to make those disclosures.
- For Nevada clients: Section 340 of the Nevada Privacy Law requires that an operator post a privacy policy, which is called a “notice” in Nevada. We are providing you this notice pursuant to state law. We will not share information we collect

about you with nonaffiliated third parties, except as permitted by law. We will not share information about your creditworthiness with our affiliates, as applicable, other than as permitted by Nevada law, unless you authorize us to make those disclosures.

- For Vermont residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by law, including, for example with your consent or to service your account. We will not share information about your creditworthiness with our affiliates, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

Aghaz is an investment adviser registered with the Securities and Exchange Commission (The "SEC") under The Securities Exchange Act of 1934 ("The Act"), specifically as an Internet adviser relying on rule 203A-2(e), as well as with the Financial Industry Regulatory Authority (the "FINRA"). The Firm is committed to safeguarding the confidential information of our clients. We will provide notice of changes in our information sharing practices. If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so you will have the opportunity to opt out of such disclosure.