

Privacy Notice

Commitment to Privacy

CIO Group LLC (CIO Group) considers privacy to be a fundamental aspect of our relationships. We are committed to maintaining the confidentiality, integrity, and security of private, personal, and confidential information in our possession. In the course of providing our products and services, we may collect, retain, and use personal information to administer our operations, comply with legal and regulatory requirements, and deliver investment advisory services.

Information We Collect

The kinds of information we may collect will depend on the nature of the relationship in which we are engaged and may include personal information (“Personal Information”) as defined under applicable U.S. and global privacy laws. Personal Information may include contact details (such as name, address, email address, and telephone number) and, where required to meet contractual, legal, or regulatory obligations, additional information such as date of birth, bank account details, tax identification numbers, and related documentation.

How We Collect Information

We typically collect this information directly from you or your authorized representatives, such as through account applications, investment policy statements, client onboarding forms, or other communications. We may also receive information from third-party sources such as custodians, brokers, financial advisers, public registers, or service providers assisting in the management of your accounts.

How We Use and Share Information

CIO Group generally does not disclose private, personal, or confidential information to non-affiliated third parties except as necessary to provide services, comply with regulatory requirements, or as otherwise permitted or required by law. Non-affiliated service providers may be used for activities such as preparing and mailing account statements, processing transactions, or maintaining account records. These service providers are contractually required to use your information only for the services provided and to maintain strict confidentiality and security controls.

We may also share information with regulators, auditors, or professional advisers as needed, as well as with affiliated entities for business and servicing purposes. Under the Gramm-Leach-Bliley Act (“GLBA”) and Regulation S-AM, you may have the right to limit

certain information sharing, particularly when Personal Information obtained from an affiliated entity is used for marketing purposes. Where applicable, you will be provided with a clear and simple method to opt out of such sharing.

CIO Group reserves the right to disclose Personal Information where we believe in good faith that disclosure is required under applicable law, to comply with regulatory or law enforcement requests, or where specifically directed by you in writing.

SMS Communications and Consent

CIO Group LLC may send SMS/text messages to clients in connection with our advisory services, such as appointment reminders, account notifications, or service-related updates. By providing your phone number and opting in to receive SMS communications, you consent to receive such messages from CIO Group LLC.

We do not share, sell, or disclose phone numbers or SMS consent information to any third parties for marketing or any other purposes. Phone numbers collected for SMS communications are used solely to provide services directly to you. SMS consent is not a condition of doing business with CIO Group LLC, and you may opt out at any time by replying STOP to any message.

Standard message and data rates may apply. Message frequency varies based on your account activity and service needs.

Identity Theft Prevention Program (Regulation S-ID)

We maintain an Identity Theft Prevention Program designed to detect, prevent, and mitigate potential identity theft in connection with client accounts. This includes monitoring for suspicious activities, implementing “red flag” detection procedures, and requiring our vendors and service providers to follow strict identity theft safeguards.

Data Security & Vendor Oversight

We maintain appropriate physical, electronic, and procedural safeguards to protect Personal Information against unauthorized access or use. These safeguards include data encryption, secure transmission protocols, and multi-factor authentication where appropriate.

In addition, CIO Group engages only third-party service providers that meet our data security standards and conducts ongoing vendor due diligence to ensure these providers maintain appropriate confidentiality and cybersecurity controls.

In addition, CIO Group may incorporate the use of technology solutions, including artificial intelligence (“AI”) tools, to assist in providing services and enhancing operational efficiency. Client information processed through such tools is subject to the same confidentiality, cybersecurity, and vendor oversight standards that apply to all our service providers.

Cross-Border Data Transfers (If Applicable)

If you are a non-U.S. client or your accounts require the use of global service providers, your Personal Information may be transferred, processed, or stored outside the United States. Where applicable, we ensure that appropriate safeguards are in place to protect your information in compliance with relevant data protection laws.

Annual Privacy Notices

You will receive this Privacy Notice at the beginning of your client relationship and, as required by law, an updated notice annually. If we make any material changes to our information-sharing practices or privacy policies, we will provide notice before the changes take effect.

Client Rights

Under applicable U.S. privacy laws, you may have the right to limit certain information sharing. Where required, CIO Group will provide you with a clear notice and a simple method to opt out of sharing your personal information for non-essential purposes, such as marketing.

For any questions about your privacy or to request a copy of this Privacy Policy, please contact our Chief Compliance Officer.

Contact Information

Any questions regarding CIO Group’s Privacy Policy should be referred to:

Chief Compliance Officer: [Sean McDermott](#)

Email: sm@ciogroup.com