

MILL CREEK CAPITAL ADVISORS, LLC

Our Privacy Policy

The Mill Creek Capital Advisors, LLC (subsequently, "MCCA") Privacy Policy Statement concerning our use of nonpublic personal information concerning you is described below. This nonpublic personal information includes financial information that is directly identifiable to you or any listing containing your name that was derived using your personally identifiable financial information. In this Policy Statement, we reference such material as "nonpublic information" or, simply, "information". MCCA does not provide information about you or any current or former client to any individual or company other than as permitted by law for the sole purpose of serving your financial needs.

Information That We Collect

All nonpublic information that we obtain is either collected because we are required by law to do so or because we think such information is necessary to administer your account(s) and serve your needs. We have described below the sources from which we obtain nonpublic information and the types of nonpublic information that we gather.

- *Applications and Other Forms.* When you open an investment advisory relationship with us or we provide a service to you, we collect information on your investor questionnaire and account opening forms that may be necessary to open your account and provide services to you. As well as your name, address and telephone number, we may also collect a variety of additional information including your social security number, age, income, net worth, investable assets, current investments and portfolio objectives.
- *Transactions.* In the course of servicing and administering your account(s) or service(s), MCCA collects nonpublic information concerning your transactions. For example, as applicable, we gather and maintain information regarding your transactions, including securities bought and sold, balances, positions, transfers and account history.
- *Third Parties.* We may verify from outside sources information regarding your identity, income or assets.

Protection of the Information That We Collect

MCCA values your trust and realizes that an important element in maintaining that trust is our ability to safeguard your personal information from unauthorized disclosure, even after your relationship with us ends. Below we describe how we protect the confidentiality and security of your information.

- *Restricted Access and Employee Training.* Authorization to access your personal information is given only to those of our employees and agents who need to know such material in order to provide you with MCCA's services and those persons authorized by you to receive such information. Recipients of your information are required to safeguard your information and hold it in the strictest of confidence. Privacy policies and procedures are an integral part of our employee training program.
- *Operational Safeguards.* We implement and maintain physical, electronic and internal procedural safeguards to protect your information.

Information Disclosed Within MCCA

MCCA may share the nonpublic information concerning you for the following purposes:

- *To Better Serve Your Needs.* Information is shared within MCCA in order to provide you with the best combination of financial services to accommodate your financial needs and to keep you informed about services that may be appropriate for you.
- *To Comply With Laws.* We also share certain information within MCCA in order to comply with applicable laws and regulations.

Information Disclosed to Third Parties

We do not share any of your nonpublic information with parties unaffiliated with MCCA other than as described below:

- In order to provide the services to you and process your transactions, it is necessary from time to time for us to disclose your information to investment managers, custodians, clearing firms, solicitors and representatives and other companies that provide certain services to us, including, for example, the printing and mailing of your account statement(s). Our agreements with such companies require that they comply with privacy laws. In your Investment Management Agreement, you consented to MCCA sharing this information as is reasonably necessary to properly serve you. If at any time, you should decide that you do not want MCCA to disclose any of your personal information in a way that is consistent with this policy, you may opt out of such disclosure by notifying MCCA in writing of this decision.
- We may disclose nonpublic information concerning you to government agencies and regulatory organizations where we believe in good faith that the disclosure is required or permitted by law.

Consumer Information

- Pursuant to Reg. S-AM MCCA will not use “eligibility information” regarding a consumer that it received from any affiliate to market any products or services.

For questions or to obtain additional information concerning MCCA’s Privacy Policy, please call Joan Straus at 610-941-2014.