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Respecting and protecting client privacy have always been vital to our relationships with clients.

The attached Privacy Notice describes how Chilton Capital Management LLC and its affiliates (“Chilton”) keeps client information private and secure and uses it to serve you better. We take our responsibility to protect the privacy and confidentiality of your information, including personal information, very seriously. We maintain physical, electronic and procedural safeguards that comply with applicable legal standards to secure such information from unauthorized access and use, alteration and destruction. We hold our employees accountable for complying with relevant policies, procedures, rules and regulations concerning the privacy and confidentiality of information. At Chilton, we understand that our relationship with you is based on trust. This is reflected in everything we do, including the way we handle our clients' nonpublic personal information.

The types of personal information we may collect include your name, date of birth, social security numbers, taxpayer identification numbers, driver’s license numbers, bank account numbers, transaction history, email address, mailing address, telephone numbers and other personal information. Chilton collects this information from you when you establish an account with Chilton or when you otherwise provide this information to Chilton, such as when you utilized the “contact us” feature of our website. In addition, from time to time, we gain access to your personal information through: (i) our interaction with you on the telephone, in person or through e-mail; (ii) account applications or other forms you complete; (iii) transactions in your accounts or on your behalf; (iv) investment advisory or financial planning tools or other information tools we may make available to you; and (v) third parties with whom we deal.

It is Chilton’s policy not to disclose any of your nonpublic personal information to third parties without your consent, unless those parties are providing services or support to us and have agreed to keep your nonpublic personal information confidential, or as otherwise permitted or required by law, court order, or valid regulatory request. Even if you cease to transact business with Chilton, we will continue to apply the same protections to your nonpublic personal information as we did when you were an active client.

Our Privacy Notice applies to the relationships of clients or former clients with Chilton. Please speak with your Chilton representative should you have any questions or concerns. Thank you for the trust and confidence you place in us.



## Notice to California Residents

This section applies only to individuals who are residents of California under the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws (collectively, “California Laws”).

Chilton has collected in the preceding 12 months, and will continue to collect the personal information such as name, date of birth, social security numbers, taxpayer identification numbers, driver’s license numbers, bank account numbers, transaction history, email address, mailing address, telephone numbers and other personal information. Chilton collects this information for the purposes of providing investment advisory services to you.

Under California Laws, California residents have the right to request that we disclose to them the categories of personal information we have collected, the categories and sources from which we have collected personal information, the commercial purpose for collecting the personal information, the categories of third-parties we have shared this information with, and the specific information we have on file about the requestor.

Under the California Laws, California residents have the right to request that their personal information be deleted, unless the personal information is necessary for Chilton to complete transactions, provide the investment advisory services Chilton was retained to provide, detect and protect against security threats, comply with the California Electronic Communications Privacy Act, or comply with legal obligations.

Under California Laws, California residents have the right to opt-out of having their personal information sold. Chilton does not sell your personal information.

**FACTS** WHAT DOES CHILTON CAPITAL MANAGEMENT LLC DO WITH YOUR PERSONAL INFORMATION?

**Why?** Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.

**What?** The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- other personal information
- bank account information and wire transfer instructions
- account balances and transaction history, and
- contact information such as e-mail addresses, mailing addresses, and phone numbers.

**How?** All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons Chilton chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Chilton share?	Can you limit this sharing?
<b>For our everyday business purposes –</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations	Yes	No
<b>For marketing purposes –</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We don’t share
<b>For our affiliates’ everyday business purposes –</b> information about your transactions and experiences	Yes	No
<b>For our affiliates’ everyday business purposes –</b> information about your creditworthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For non-affiliates to market to you</b>	No	We don’t share

**To limit our sharing** Call Chris St.Paul (800) 919-1995  
Email [compliance@chiltoncapital.com](mailto:compliance@chiltoncapital.com)

**Questions?** Call Chris St.Paul (800) 919-1995  
Email [compliance@chiltoncapital.com](mailto:compliance@chiltoncapital.com)

<b>Who we are</b>	
<b>Who is providing this notice?</b>	Chilton Capital Management, LLC (“Chilton”)

<b>What we do</b>	
<b>How does Chilton protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We authorize our employees, agents and contractors to get your information only when needed to do their work for us. We require companies working for us to protect your information.
<b>How does Chilton collect my personal information?</b>	We collect your personal information, for example, when you: <ul style="list-style-type: none"> <li>▪ open an account or seek advice about your investments</li> <li>▪ direct us to buy securities or sell securities</li> </ul> We also collect your personal information from others.
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only: <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for non-affiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account.

<b>Definitions</b>	
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> <li>▪ <i>Our affiliate includes Chilton Capital Management Trust Co.</i></li> </ul>
<b>Non-affiliates</b>	Companies not related by common ownership or control. They can be financial and non-financial companies. <ul style="list-style-type: none"> <li>▪ <i>Chilton and its affiliates does not share with non-affiliates so that they can market to you.</i></li> </ul>
<b>Joint marketing</b>	A formal agreement between non-affiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>▪ Chilton doesn't jointly market.</li> </ul>

<b>Other important information</b>
<b>State Laws:</b> CA: Accounts with a California address are automatically treated as if they have limited the sharing and we will not share information about you within, or with financial companies outside, our family of companies unless we first provide you with privacy choices or unless otherwise permitted by law.