

ESF Equity, LP

Privacy Notice

ESF Equity, LP (“ESF”, “the firm”, “we”, “our”) is committed to protecting your privacy and the confidentiality of your personal and financial information. The measures we take to keep your personal information private and secure are outlined below.

What does ESF do with your personal information?

Information We Collect

In providing services to you, we collect, retain, and use information about you to serve your financial needs, inform you of products and services that may be of interest, and administer our relationship to you. This information, known as non-public information, may be collected from several sources, including applications and other forms you file with us, records of transactions and past activities with us, third parties with whom we have business relationships to verify your identity and information, and third parties such as consumer reporting agencies. This information includes, among other things, financial status information (i.e., net worth, assets, and tax information); personal identifying information (i.e., social security number and tax identification numbers); investment objectives, risk tolerance, and experience; and past transaction history.

How We Collect Your Information

We collect your information, for example, through our Customer Identification Program when you are onboarded as a new client in compliance with our obligations under the USA PATRIOT Act and the Bank Secrecy Act, whereby we are required to request certain identifying information and supporting documentation from all prospective clients and their beneficial owners.

How We Protect Your Information

We use procedural physical and electronic system safeguards to store and secure information about you in compliance with federal standards. Our systems protect your information from unauthorized access, alteration, and destruction. Access is only permitted to those individuals within our firm who need the information to perform their job responsibilities and those third parties with whom we use to provide the operations and services to carry out our business. Any such third party with whom we have a business relationship that will have access to non-public information is similarly required to maintain the privacy of your information.

Sharing of Information

We do not sell your personal information to anyone or any entity for marketing purposes or otherwise. We do not disclose your personal information to non-affiliated third parties except for the following reasons. We share information about you to: 1) to service providers that assist us in processing your transactions; 2) for our own marketing purposes to offer our products and services to you; 3) for everyday business activities and to provide services and conduct our operations, and 4) under those circumstances as permitted or required by law. Information that may be shared is all the information described under the section “Information We Collect”.

Our Policy Concerning Former Clients

If you decide to cease conducting business with us, we will continue to adhere to the privacy policies and practices as described in this notice. We reserve the right to change this policy at any time and you will be notified if any changes occur.

How Can I Limit the Sharing of Information?

If for any reason at any time in the future, we find it 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 and the opportunity to opt out of such disclosure.

Miscellaneous

For Vermont Residents. In accordance with Vermont law, we will not share information we collect about Vermont residents with companies who are not affiliates, except as permitted by law, such as with your consent or to service your accounts

For California Residents. In accordance with California law, we will not share information we collect about you with non-affiliates, except as allowed by law. For example, we may share information with your consent or to service your accounts. Among our affiliates, we will limit information sharing to the extent required by California law.

Please note:

If you are a new client, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our client, we continue to share your information as described in this notice.

However, you can contact us at any time to limit our sharing.

How to Obtain More Information

You can contact our Chief Compliance Officer, for any questions about our privacy policy or to seek assistance about options for limiting the sharing of your information.