



PROTECTION OF YOUR PERSONAL INFORMATION BY BELLWETHER INVESTMENT MANAGEMENT USA, ITS AFFILIATES AND SUBSIDIARIES. ("Privacy Policy")

Like most industries today, the financial services industry is rapidly being shaped by technology, which is changing the way the industry does business. To be successful in this environment, we must continue to ensure our visitors have access to a broad range of financial investment information, products, and services. To deliver financial investment information, products, and services as effectively and conveniently as possible, it is essential that we use current technology to manage and maintain certain information. We want to assure all our visitors that whenever information is used, it is done with discretion, integrity, and conforming to high security standards. The safeguarding of visitor information is an issue we take seriously. To affirm our continuing commitment to the proper use of visitor information, we have set forth the following Privacy Policy. It is this Privacy Policy that guides us in serving the privacy needs of our visitors.

WHO WE ARE

Bellwether Investment Management USA is owner and operator of domain www.bellvestusa.com and its subdomains. Bellwether Investment Management USA, Promus Advisors and Fulcrum Equity Management, LLC ("Fulcrum") are affiliated but organized separately. Promus Advisors and Fulcrum are SEC registered investment advisers. SEC registration does not constitute an endorsement of the firm by the SEC, nor does it indicate that the advisers have attained a particular level of skill. Promus Advisors, Fulcrum and its investment adviser representatives may only conduct business with residents of the United States and jurisdictions in which they are properly registered or where an exemption is determined. Promus Advisors and Fulcrum's management fees are separate and may be in addition to the fees of Bellwether Investment Management USA, its products, or services. All data presented is per Bellwether Investment Management USA's internal database.

Promus Advisors and Fulcrum Equity Management are SEC Registered Investment Advisers. Their investment adviser representatives provide financial products and services to the public. To access a copy Promus Advisors' or Fulcrum's privacy policy, refer to www.promusadvisors.com or www.fulcrumeq.com to learn more about their privacy policies.

Financial companies choose how they share personal information. Federal law gives consumers the right to limit some, but not all, information sharing. Federal law also requires us to describe how we collect information about you, under what circumstances we may disclose the information to others, and how we safeguard your information in our possession.



Please read this notice carefully to understand the privacy policies.

WHY WE COLLECT INFORMATION

We collect and use information about you in order to provide financial investment information, products and services.

WHAT INFORMATION WE COLLECT

The information collected may include personal financial information such as your name, address, social security number, assets, income, net worth, investment experience, risk tolerance, investment objective, beneficiary designations, and other information derived from your account application.

HOW WE COLLECT INFORMATION

We obtain most information directly from you when you establish a contact or request financial investment information, products, or services. For example, we may collect your personal information directly from you when you seek advice about financial investing, provide employment information, or provide your government-issued ID. We may also obtain information about you from our affiliated advisors and from third parties such as retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies, prior broker-dealer, or adviser, as well as their registered representatives or advisers, clearing firms, or others who have provided you with financial products or services.

INFORMATION WE DISCLOSE

We may disclose information about you, as described above, to our staff, affiliates, representatives, their affiliated businesses, non-affiliated third parties who provide you with financial products and services, and our service providers, such as a mailing company. These non-affiliated third parties may include retirement plan sponsors or third-party administrators, mutual fund companies, insurance companies and agencies, other broker-dealers, and clearing firms. Our Privacy Policy is the same for current, as well as former visitors. We may disclose information such as your name, address, social security number, date of birth, transactional information, or other financial information, when necessary for us to provide you with financial investment information, products and services, or where disclosure is prescribed by law. For example, we may disclose information during the course of an audit, or to law enforcement or regulatory agencies. We do not disclose your information to non-affiliated companies who intend to market their products to you. For example, we will not sell visitors' names and addresses to a catalog or marketing company.



“OPTING OUT” OF THIRD-PARTY DISCLOSURES

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some, but not all information sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information.

Federal law gives you the right to limit only:

- Sharing for affiliates’ everyday business purposes – information about your creditworthiness
- Affiliates from using your information to market to you.
- Sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. The Company may utilize common information systems or databases to which employees of our affiliates may have access that could contain your information. However, such information will not be disclosed by a Company affiliate, except as permitted by law.

HOW WE PROTECT PERSONAL INFORMATION

To protect your personal information from unauthorized access and use, we use commercially reasonable technical and physical security measures that comply with applicable law. When we share information with third parties, we hold parties to commercially reasonable standards of privacy protection. We have policies designed to ensure only those people who need your information to perform their job have access to it. In addition, we maintain physical, electronic, and procedural security measures that comply with applicable regulations to protect your information. We train our employees in the proper handling of personal information.

This website is hosted by DigitalOcean in San Francisco, California.

OTHER APPLICABLE LAWS

The practices described are in accordance with Federal Law. We also follow privacy requirements under applicable state law. If a state’s privacy laws are more restrictive than those stated in this policy, we comply with those laws.



QUESTIONS

If you have questions about our privacy policy, you may contact us at:

Bellwether Investment Management USA

108 Lakeland Avenue

Dover, Delaware

Kent County

19901

USA

You may also call us at 1.866.469.7990 or contact us electronically at info@bellvest.ca



What are Cookies and Web Beacons?

Cookies are pieces of data that a website transfers to a user's hard drive for record-keeping purposes. Web beacons are transparent pixel images that are used in collecting information about website usage, e-mail response and tracking. Generally, cookies may contain information about your Internet Protocol ("IP") addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the website or your usage of our services, including a history of the pages you view.

How We Use Cookies and Web Beacons

Bellwether Investment Management USA collects information from cookies and web beacons and stores it in an internal database. This information is retained in accordance with our Privacy Policy. This website uses the following cookies and web beacons:

Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can configure your browser to block or alert you to these cookies, but certain areas of the site will not function properly. These cookies do not store any personal data.

Performance Cookies and Web Beacons

These cookies and web beacons allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information that these cookies and web beacons collect is aggregated and, therefore, anonymous. If you do not allow these cookies and web beacons our aggregated statistics will not have a record of your visit. The website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyze how you use this website. The information generated by the cookie about your use of this website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purposes of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.



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Managing Your Cookie Preferences

You have many choices with regards to the management of cookies on your computer. All major browsers allow you to block or delete cookies from your system. However, if you do decide to disable cookies you may not be able to access some areas of our website, or the website may function incorrectly. To learn more about your ability to manage cookies and web beacons and how to disable them, please consult the privacy features in your browser or visit www.allaboutcookies.org. This website may link through to third party websites which may also use cookies and web beacons over which we have no control. We recommend that you check the relevant third parties' privacy policy for information about any cookies and web beacons that may be used.