March 29th, 2022

PRIVACY and NON-DISCLOSURE NOTICE

Spark Asset Management Group, LLC (“Spark”) recognizes that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. This PRIVACY and NON- DISCLOSURE NOTICE generally describes our policy about how we treat that information. This notice refers to Spark and its affiliated companies using the terms “we” “us” and "our."

How we obtain information. We obtain most of the information we need directly from you on your application or other forms, or from those whom you have authorized to provide information to us in connection with providing you with our services. We also obtain information in the course of processing and recording your transactions with us and from your on-going discussions with us.

Information we may obtain. The type of information we obtain depends on the type of service or product we are providing. The types of information we may obtain fall into the following general categories:

Customer Information. Customer information includes identifying information such as your name, address, telephone number, social security number, and demographic data about you. It also includes information about your transactions with us such as the type and value of investments that you own.

Financial Information. Financial information is information covered by the Fair Credit Reporting Act and includes information such as your credit history, income, assets, investment objectives, investment experience, and type and value of other investment products you own or for which you have applied.

Security of the information. We maintain physical, electronic, and procedural safeguards that we believe comply with existing Federal and State requirements to guard the confidential information we obtain.

What we do with the information we obtain. We use information about you for business purposes such as evaluating your request for investments or other services or products, administering our services and products, and processing your transactions. We may also use information about you to offer you other services and products.

Disclosure of information. Under our current privacy policy we do not sell information about you to others. In order to offer you services and products that may be of value to you, we may, where permitted by law; disclose any or all of the customer information described above to the following:

• service providers who assist us in administering, processing, or otherwise servicing your accounts;

• custodians and broker-dealers who can articulate a regulatory need to supervise or review Spark's activities, and employees of Spark and/or service providers as permitted or required by law;

• third party organizations retained to provide marketing services on our behalf;

• financial professionals such as, but not limited to, CPAs and attorneys, and other such persons to whom you have specifically authorized us to disclose the information;

• companies affiliated with us that offer financial services or products;

• non-affiliated companies and individuals that provide financial services or products on your behalf.

Confidential Personal Information. Spark Asset Management Group, LLC will not disclose the confidential personal information described above outside of Spark Asset Management Group, LLC except as described above, unless you have authorized us to do so, or as permitted or required by law.

Changes to our PRIVACY and NON-DISCLOSURE NOTICE. Our policy about obtaining and disclosing information may change from time to time. We will provide you with notice of any material change to this policy.