

PRIVACY STATEMENT

Gray Equity Management, LLC is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

We receive personal information about you and all our clients from information you submit to us on forms, applications, tax returns, conversations and through information we obtain over the course of your business relationship with us, our affiliates, and others. We use this information to help you meet your personal financial goals.

With your permission, we may disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment. The Company's computers (which include any computer or other electronic device which may contain client information) are connected to three physical servers, which leverage industry standard data protection and backup features. Hard copies of documents containing personal information that are kept at our offices are securely stored and only made available to employees who need to know the information to provide you with our services.

Employees are prohibited from using personal email accounts or messaging functions on any social media website when communicating client information.

We do not provide your personal information to mailing list vendors or solicitors.

We maintain a formal, internal Privacy Policy whereby all employees who have access to private, nonpublic client information sign an acknowledgement form which acknowledges the Company's Privacy Policies.

We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client and for the required period thereafter that records are required to be maintained by federal and state securities laws. At that time information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Statement to you annually, in writing.

April 22, 2019