



PRIVACY POLICY NOTICE

Vergence Institutional Partners LLC

Vergence Institutional Partners LLC has adopted this privacy policy recognizing that protecting the privacy and security of the personal and non-public information we obtain regarding our clients is an important responsibility. We are honored to merit your trust and seek to remain worthy of it. As such, we adhere to the following policies:

- We treat the information we collect regarding our clients – past, present, and prospective – confidentially. We may disclose non-public information regarding our clients only in circumstances that are consistent with a client’s direction and the policies of Vergence Institutional Partners LLC.
- We will only share a client’s non-public information with non-affiliated third parties when (I) required by regulatory authorities or by applicable law or (II) to the extent necessary to provide services that the client has requested or authorized. In the latter case, we are required first to obtain the client’s affirmative declaration (an “opt-in”) allowing us to do so.
- Within our firm, we restrict access to our clients’ non-public information to those employees who require the information to service our clients’ accounts. We maintain physical, electronic, and procedural safeguards to protect our clients’ non-public information that comply with applicable federal or state standards and the policies of Vergence Institutional Partners LLC.
- The partners and employees of Vergence Institutional Partners LLC are prohibited from disclosing or using confidential information regarding our clients as outlined in the Company’s Code of Ethics. Each partner and employee is required to understand and acknowledge the Code of Ethics and confirm adherence to the policies contained therein on an annual basis.
- We will not sell personal information to any outside individual or organization.

Questions? If you have questions about this privacy notice or the privacy of your customer information, please call our main number - (617) 588-2130 - and ask to speak with Thomas L. Douglas, the firm’s Chief Compliance Officer.

Effective 01/01/2024