
NUVERSE ADVISORS LLC

Privacy Policy

March 29, 2024

NUVERSE ADVISORS LLC

PRIVACY POLICY

This Privacy Policy explains the manner in which Nuverse Advisors LLC (the “Company”) collects, utilizes and maintains nonpublic personal information about its investors in related investment vehicles and managed accounts, as required by certain rules and regulations. This Privacy Policy only applies to nonpublic personal information of investors in investment vehicles and managed accounts who are individuals (not entities) who make investments for personal, family or household purposes and not business purposes. The Company reserves the right to change or revoke this Privacy Policy at any time.

Why and How We Collect Investor Information

The Company obtains nonpublic personal information in the course of providing investment solutions to investors. The Company uses this information about investors to manage accounts, direct transactions and provide investors with valuable information.

The Company collects nonpublic personal information about investors through the following sources:

- Subscription forms, investor questionnaires and other information provided by the investor in writing, in person, by telephone, electronically or by any other means. This information will include name, address, social security number or tax identification number, nationality, employment information, financial and investment qualifications, including risk tolerance and investment objectives; and
- Transactions within the clients’ managed accounts or within the investment vehicles, including, but not limited to, account balances, investments and redemptions.

The Company will not obtain nonpublic personal information from any other source.

Disclosure of Nonpublic Personal Information

The Company does not share nonpublic personal information about investors or potential investors with nonaffiliated third parties or to affiliated entities, except as permitted by law. For example, the Company may share nonpublic personal information in the following situations:

- To comply with federal, state or local laws, rules and other applicable legal requirements;
- To comply with a properly authorized civil, criminal or regulatory investigation or subpoena or summons by federal, state or local authorities;
- To protect against or prevent actual or potential fraud, unauthorized transactions (such as money laundering), claims or other liabilities;

- To our service providers as needed in connection with the administration and servicing of managed accounts or the investment vehicles, which may include attorneys, accountants, auditors, or other professionals; To process or complete transactions for investors; and
- Upon consent of an investor to release of such information, including authorization to disclose such information to persons acting as an agent or in a fiduciary or representative capacity on behalf of the investor.

Protection of Investor Information

The Company maintains safeguards that comply with federal and applicable state standards to protect customer information. The Company will restrict access to the personal and account information of investors to those employees or agents who need to know that information in the course of their job responsibilities. Third parties with which the Company shares investor information must agree to follow appropriate standards of security and confidentiality. The Company will destroy, erase or make unreadable data, computer files, and documents containing nonpublic personal information prior to disposal.

The Company also maintains and implements a written information security program to protect investor personal information. The program identifies risks to the confidentiality and security of records containing personal information and has procedures for assessing the likelihood and potential damage of such threats. Technical, physical, and administrative safeguards are in place for the protection of personal information and are regularly monitored for effectiveness.

Further Information

The examples contained within this notice are illustrations and are not intended to be exclusive. This notice complies with federal and applicable state law regarding privacy. Investors may have additional rights under other laws. The Company reserves the right to modify its privacy policy at any time, and will notify investors before it implements any material changes.

Please contact Lou Marino at (305) 932-6010 if you have any questions.