



PRIVACY NOTICE

Pursuant to Regulation S-P adopted by the Securities and Exchange Commission, it is the policy of **Tradition Capital Management, LLC** (“**Tradition**”) to keep confidential nonpublic personal information (“*information*”) pertaining to each current and former client (i.e., information and records pertaining to personal background, investment objectives, financial situation, investment holdings, account numbers, account balances, etc.) unless **Tradition** is: (1) previously authorized by the client to disclose *information* to individuals and/or entities not affiliated with **Tradition**, including, but not limited to the client’s other professional advisors and/or service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of Regulation S-P. The disclosure of *information* contained in any document completed by the client for processing and/or transmittal by **Tradition** in order to facilitate the commencement/continuation/termination of a business relationship between the client and a nonaffiliated third party service provider (i.e., broker-dealer, secondary unaffiliated investment adviser, account custodian, insurance company, etc.), including *information* contained in any document completed and/or executed by the client for **Tradition** (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding nonaffiliated third party service provider.

Tradition may disclose confidential, non-public information to an affiliate under substantially common ownership and control for the purposes of introduction of products and services of the affiliated company. Prior client notification of the intent to offer such services or products of such affiliate will be obtained pursuant to Reg S-P and Reg S-AM.

When certain clients of **Tradition** are introduced through referral sources such as institutional/retail brokers (ie. broker-dealer sponsors of wrap services and broker-dealer third party manager programs), for the sole purpose for the utilization of Tradition advisory and investment services, such clients will not have their confidential non-public information disclosed for any services of any affiliates.

Each individual and/or entity affiliated with **Tradition** is aware of **Tradition**’s *Privacy Policy*, and has acknowledged his/her/its requirement to comply with same. In accordance with **Tradition**’s *Privacy Policy*, each such affiliated individual and/or entity shall have access to information to the extent reasonably necessary for **Tradition** to perform its services for the client, and to comply with applicable regulatory procedures and requirements.

Should you have any questions regarding the above, please contact **Michael C. Provine, Chief Compliance Officer, and Managing Director** of **Tradition Capital Management, LLC**, at 908-598-0909, or at mprovine@traditioncm.com.