

# Lodestar Private Asset Management LLC

## CONSUMER PRIVACY NOTICE

This notice is being provided on behalf of Lodestar Private Asset Management LLC (“Lodestar”). Lodestar strongly believes in protecting the confidentiality and security of information we collect about individuals. This notice describes our privacy policy regarding:

- How we treat the information we receive (“Information”) about individuals who apply for or obtain our services (“Individuals”); and
- The third parties with whom we may share this information.

**Information we collect.** “Nonpublic Personal Information” is nonpublic information about the Individual that we obtain in connection with providing a financial service to the Individual for personal, family, or household purposes.

We collect Nonpublic Personal Information about Individuals from the following sources:

- Information provided to us directly by an Individual, either verbally, or on an application, questionnaire, survey or other form in connection with our services. This may include but not be limited to: name, address, social security number, assets, income and taxes.
- Information about an Individual’s transactions with us, our affiliates, or other third parties, such as account balance, parties and details regarding securities transactions, debit card usage, and insurance policy coverage and premiums.

**Information Safeguards.** During regular business hours access to customer records is monitored so that only those with approval may access the files. We maintain physical, electronic and procedural safeguards to protect Information. No individual with authorization to access Information is permitted to share that Information in any manner without the specific consent of a firm Principal. Failure to observe Lodestar’s procedures regarding customer and consumer privacy will result in discipline and may lead to termination.

**Sharing Nonpublic Personal Information.** Lodestar is committed to the protection and privacy of its customers’ and consumers’ personal and financial information. Lodestar will not share Nonpublic Personal Information with any affiliated or nonaffiliated third party (such as Charles Schwab & Co., Inc.) except:

- When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians;
- When required to maintain or service a customer account;
- To resolve customer disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the customer;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- In connection with a sale or merger of Lodestar’s business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- To comply with federal, state or local laws, rules and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- In any circumstances with the customer’s instruction or consent; or
- Pursuant to any other exceptions enumerated in the California Information Privacy Act.

**No Joint Agreements.** Lodestar has no joint marketing or servicing arrangements with unaffiliated third parties through which it shares Nonpublic Personal Information about Individuals, except as necessary to carry out authorized client services.

**Disclosure of Information About Former Customers.** If an Individual decides to close an account or otherwise becomes an inactive customer, we will continue to follow privacy practices described in this notice with respect to such Individual.

**Opt-Out Provisions.** It is not a policy of Lodestar to share Nonpublic Personal Information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service customer accounts or is mandated by law, there are no allowances made for clients to opt out.

**Business Continuity.** Lodestar has developed a Business Continuity Plan that details how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

*Contacting Us* – If after a significant business disruption you cannot contact us as you usually do, you should call our alternative number 925.708.2701 or access the following web address [www.lodestarpam.com](http://www.lodestarpam.com).

*Our Business Continuity Plan* – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

**Important Information about Opening a New Account.** To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify and record information that identifies each person who opens an account. We may ask to see your driver’s license, passport or other identifying documents that contain your photograph. Or, for entity clients, we may request formation documents for company verification.

**Code of Ethics.** Lodestar has adopted a Code of Ethics (the “Code”) which covers its employees and Advisory Representatives (“Covered Persons”). The Code requires that all Covered Persons conduct all business dealings in an ethical fashion, and encourages all Covered Persons to meet not only the technical requirements of the Code but also its spirit. Under the Code, Covered Persons have an affirmative duty of care, loyalty and honesty and must act in the best interests of their clients.

Lodestar’s Code requires Covered Persons to comply with all federal securities laws. In addition, Covered Persons are prohibited from defrauding, misleading, or manipulating a client in any way in connection with the purchase or sale of a security. Further, Covered Persons may not favor the interests of one client over the other. In the course of normal business, Covered Persons may receive confidential information concerning clients and potential clients. The general rule, as discussed in the Code, is that this information should never be communicated to anyone other than Advisory Representatives, assistants, and employees of Lodestar who need to know, and where appropriate, to the participants involved in a specific transaction.

The Code has strict guidelines regarding personal securities transactions, designed to ensure that Covered Persons are not misusing their inside positions at clients’ expense. Covered Persons are specifically prohibited from profiting personally, directly or indirectly, as a result of knowledge about a security or transactions. To enable Lodestar to monitor compliance with the Code, Lodestar requires that Covered Persons provide Lodestar with duplicate copies of confirmations and statements for accounts held at other financial institutions. A copy of the Code of Ethics is available to clients upon request.