

## **ATLANTIC EQUITIES LLP**

### **PRIVACY POLICIES AND PROCEDURES**

#### **PROTECTING CONFIDENTIALITY OF CLIENT INFORMATION**

##### **Confidential Client Information**

In the course of Atlantic's investment advisory activities, Atlantic may gain access to non-public personal information about clients and customers of Atlantic, or about customers of Atlantic's clients. Such information may include personal information we obtain from clients, personal financial and account information, information relating to services performed for or transactions entered into on behalf of clients, advice provided by Atlantic to clients, and data or analyses derived from such non-public personal information (collectively, "Confidential Client Information"). All Confidential Client Information, whether relating to Atlantic's current or former clients and customers, is subject to these Privacy Policies and Procedures. Any doubts about the confidentiality of information must be resolved in favor of confidentiality.

Atlantic will use Confidential Client Information provided by you to improve the calibre of Atlantic's information and services that are offered. This will include using your information for:

- editorial and feedback purposes;
- carrying out analysis for marketing and promotional purposes;
- developing and improving our product; and
- improving and updating Atlantic's website.

##### **Non-Disclosure of Confidential Client Information**

Atlantic does not disclose Confidential Client Information to any non-affiliated third parties, except in the following circumstances:

- As necessary to provide the service that the client requested or authorized. Atlantic will require that any financial intermediary, agent or sub-contractor utilized by Atlantic shall comply with substantially similar standards for non-disclosure and protection of Confidential Client Information and use the information provided by Atlantic only for the performance of the specific service requested by Atlantic.
- As required by regulatory authorities or law enforcement officials who have jurisdiction over Atlantic, or as otherwise required or permitted by any applicable law. In the event Atlantic is compelled to disclose Confidential Client Information to any non-affiliated third party other than a government agency or self-regulatory organization, Atlantic shall to the extent feasible provide prior notice to the clients affected, so that the clients may seek a protective order or other appropriate remedy. If no

protective order or other appropriate remedy is obtained, Atlantic shall disclose only such information, and only in such detail, as is required.

- To the extent reasonably necessary to prevent fraud, unauthorized transactions or liability.

### **Security Standards**

We restrict access to Confidential Client Information to those employees who need to know that information to provide products or services to the client. We maintain physical, electronic, and procedural safeguards that guard Confidential Client Information. Where appropriate, we employ firewalls, encryption technology, user authentications systems (*e.g.*, passwords and personal identification numbers) and access control mechanisms to control access to systems and data. We will continue to assess new technology to evaluate its ability to provide additional protection for Confidential Client Information.

### **Privacy Notices**

Atlantic shall provide each client with an initial notice of its current Privacy Policies and Procedures at the time a client relationship is established. Likewise, if at any time Atlantic adopts any material changes to these Privacy Policies and Procedures, Atlantic shall notify each client of such material change. Each client shall be requested to acknowledge receipt of such notices.

Atlantic shall provide each client with a new notice of Atlantic's current Privacy Policies and Procedures at least annually.

Date: 19<sup>th</sup> July 2006