

Introduction

Alta Capital Management, LLC (“Alta”, “we,” “us,” or “Company”) is strongly committed to respecting and protecting your privacy. Please carefully read the following Privacy Policy (“Policy”). In order to ensure your privacy, the information we collect from clients and visitors to this Website (the “Site”) is used only in the manner and for the purposes described in this Policy.

The purpose of this Policy is to explain the type of information that the Company collects, what we do with that information, and with whom the Company shares this information. Anyone who provides personally identifiable information (“Personal Information”) or any other information to the Company consents to the collection, use and disclosure of such information under the terms of this Policy. This Policy applies to both our clients to whom we provide services (“Clients”) and to those individuals who browse and use our Site (“Visitors”).

Information Collected From Visitors to our Site

Cookies are small text files that are stored in your computer's memory and hard drive when you visit certain web pages. When you access altacapital.com (or any web site), your web browser may automatically send information about your computer, e.g., your User agent and IP address, if your computer enables cookies. We do not store this information; however, we do use it to measure and track visitors to our Site. This enables us to improve our Site, for example, by determining whether Visitors can find information easily, or by identifying the aspects of the Site that are of the most interest to them. However, we do not run third-party browser cookies on our Site.

Voluntary information collected through the “Contact Us” page is securely maintained by us and is used only for the purposes outlined herein. Once you have requested information from us, we may communicate with you via email regarding your request to provide additional information related to your initial information request. However, we will never ask you to send personal information such as account or Social Security numbers by non-secure email.

Websites That We Link To

Internet sites that you link to from the Alta Site may contain privacy provisions that differ from the provisions of our Privacy Policy. To ensure your privacy is protected, we recommend that you review the privacy statements of other Internet sites linked to our Site.

Our Privacy Notice

Alta maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its clients’ non-public personal information (“information”). Through this Policy and its underlying procedures, Alta attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information.

It is the policy of Alta to restrict access to all current and former clients’ information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/non-affiliated entities who need to know that information in order to provide products or services in furtherance of the client's engagement of Alta.

In that regard, Alta may disclose the client's information:

- (1) to individuals and/or entities not affiliated with Alta, including, but not limited to the client's other professional advisors and/or certain service providers that may be recommended or engaged by Alta in furtherance of the client's engagement of Alta (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, record keeper, etc.);
- (2) if we are required to do so by judicial or regulatory process; or,
- (3) as otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations.

The disclosure of information contained in any document completed by the client for processing and/or transmittal by Alta to facilitate the commencement/continuation/termination of a business relationship between the client and/or between Alta and a non-affiliated third-party service provider (i.e., broker-dealer, investment adviser, account custodian, record keeper, insurance company, etc.), including, but not limited to, information contained in any document completed and/or executed by the client in furtherance of the client's engagement of Alta (i.e., advisory agreement, client information form, etc.), shall be deemed as having been automatically authorized by the client with respect to the corresponding non-affiliated third-party service provider.

Alta permits only authorized employees who have signed a copy of Alta's Policies and Procedures Manual and Code of Ethics to have access to client information. Employees violating Alta's policies will be subject to Alta's disciplinary process. Additionally, whenever Alta hires other organizations to provide services to Alta's clients, we will require them to sign confidentiality agreements and/or the Privacy Policy.

Amendment and Contact Information

From time-to-time, we may update, modify or change this Policy. When this occurs, our new Policy will be posted on this Site. We urge you to check this Site periodically to review the most recent Privacy Policy. Should you have any questions about this Policy, please contact us at contactaltacapital@altacapital.com.

Amended and Effective: This Policy took effect, December 2018.