

Important Information Concerning Client Privacy

At Sand Hill Global Advisors, protecting the privacy and confidentiality of your personal information is important to our employees and to us. We value your business and the trust you put in Sand Hill Global Advisors. To offer you the financial products and services you seek, we collect, maintain and use information about you on a routine basis. To help you better understand how your personal information is protected here at Sand Hill Global Advisors, we are providing you with the following statement describing our practices and policies with respect to the privacy of customer information. In the event you terminate your client relationship with us, or become an inactive client, we will continue to adhere to the policies and practices described in this notice.

Information We Collect

As a trusted investment advisor, we collect, retain and use nonpublic personal information about individual clients to provide products and services to our clients. We may collect nonpublic personal information about you from such sources as:

- Applications or other forms;
- > Information about your transactions with us, or others.

Who Receives Information and Why

Most of the information Sand Hill Global Advisors collects is used for only one purpose: to help deliver the services you've requested, easily and efficiently. It may also permit Sand Hill Global Advisors to design and offer specific products that will be useful to you. Sand Hill Global Advisors does not disclose any non-public personal information about our clients or former clients to anyone, except as permitted by law.

Service Providers

At times, Sand Hill Global Advisors will enter into arrangements with companies or firms whose expertise is essential for Sand Hill Global Advisors' own services to function properly or to complete transactions. For example, Sand Hill Global Advisors works with custodians that generate account statements for our clients' accounts. As permitted by law, Sand Hill Global Advisors discloses to these service providers customer information that is necessary to perform these functions.

Sand Hill Global Advisors' service providers are required to safeguard your information and use it only for authorized purposes.

How We Protect Your Information

The protection of your nonpublic personal information is of the utmost importance. Guarding your privacy is our obligation. Sand Hill Global Advisors maintains strict procedures and policies to safeguard your privacy. We restrict employee access to client information to only those who have a business reason to know such information, and we educate our employees about the importance of confidentiality and client privacy.

Information for Vermont, California and Nevada Clients

Sand Hill Global Advisors does not disclose personal client information. However, we are required by law to include the following state-specific information in our privacy policy:

<u>Vermont</u>: If we disclose personal information about you to non-affiliated third parties with whom we have joint marketing agreements, we will only disclose your name, address, other contact information, and information about our transactions or experiences with you.

<u>California</u>: We automatically treat accounts with California billing addresses as if you do not want to disclose personal information about you to non-affiliated third parties except as permitted by the applicable California law. We will also limit the sharing of personal information about you with our affiliates to comply with all California privacy laws that apply to us.

Nevada: Nevada law requires us to disclose that you may request to be placed on our "do not call" list at any time by calling 1-831-759-6300. To obtain further information, contact the Bureau of Consumer Protection, Office of the Nevada Attorney General at 555 E. Washington Ave., Suite 3900, Las Vegas, NV 88101; phone 1-702-486-3132; email BCPINFO@ag.state.nv.us"

Where to Find Out More

If you have any questions about our privacy program or the way your information is maintained and used, we would like to hear from you. Please call us at 650-854-9150, or write to:

Compliance Department Sand Hill Global Advisors 245 Lytton Avenue, Suite 300 Palo Alto, CA 94301

Your trust is important and Sand Hill Global Advisors is committed to protecting your privacy. Thank you for choosing Sand Hill Global Advisors.



PRIVACY PROGRAM

Frequently Asked Customer Questions

- Q: What kind of information about me do you collect?
- A: We gather only information that is needed to service your account(s) or relationship with us. Some of this information may be "public" information, such as your property address or in some cases a telephone number. Other information is "nonpublic" information, such as your social security number or credit report.
- Q: Why do you need this information?
- A: There are several reasons. For example, in some cases, we need the information to approve or administer your account. Some information allows us to better understand your financial needs so that we can provide you with products and services we think will be of value to you.
- Q: How does Sand Hill Global Advisors secure my personal information?
- A: Sand Hill Global Advisors has established safeguards physical, electronic and procedural to guard your personal information. We do not authorize access to customer information except to those who have a business reason to know such information, and we educate our employees about the importance of customer privacy.
- Q: Does Sand Hill Global Advisors sell its client lists?
- A: Unequivocally, no.
- Q: If I give my personal information to Sand Hill Global Advisors, who else might have access to it and for what purpose?
- A: When you provide nonpublic personal information to Sand Hill Global Advisors, you have entrusted us to use it only for business purposes and to protect it from anyone who has no "need to know." However, in order to service your account or investment product, we may need to share your information within the company in order to provide you with a choice of the many products and services we have to offer.
- Q: Do you share my personal information with outside firms?
- A: When we share your nonpublic information with reputable outside firms, it is for limited business purposes as allowed by law, as needed to provide optimal service to you.
- Q: Why do you share information with outside firms?
- A: In order to service your account relationship, we must provide information with certain outside firms that provide specialized services. For example, we entrust brokerage firms with the necessary information about your account to allow them to execute securities transactions on your behalf.

- Q: What kind of information do you share with these outside firms?
- A: We share only the information necessary to service your account, provide you with a financial product, enforce a transaction you have authorized, and so forth. We do not share information unrelated and unnecessary to the specific function performed by that outside firm.
- Q: Will these outside firms keep my information confidential?
- A: When we contract with outside firms and entrust them with our customers' nonpublic personal information, we require that these firms use the information only for the purposes for which we have given it to them, and we require that these firms acknowledge their responsibility for maintaining systems and procedures to secure and protect the information.
- Q: Is it possible to prevent information sharing with outside parties?
- A: Because Sand Hill Global Advisors does not share nonpublic personal information with unaffiliated parties except as permitted by law, a customer may not prevent such information sharing.
- Q: What information can't I prevent from being shared with outside parties?
- A: Some of your information is publicly available in such records as phone directories, registries, etc., and Sand Hill Global Advisors cannot control its use by others. Like all financial institutions, we may also need to share certain nonpublic information with such third parties as executing brokers, auditors or attorneys in order to service your account or investment relationship, or to comply with certain laws.