

## **Privacy Policy**

### 2024

Protecting your privacy is important to Delta Investment Management. We want you to understand what information we may gather and how we may share it. This Privacy Policy applies to Delta's collection, use, retention and security of the nonpublic personal information about our clients. The information we collect from you comes primarily from the registration process and includes contact and other personal information. It is necessary for us to obtain this information in order to fulfill account applications and orders, and to provide you with notifications. This policy is provided to you as required by applicable financial privacy laws.

### ***How We Share Information***

- Delta may disclose nonpublic information about you with our clearing and sub-advisor firms as part of the normal course of account management.
- Delta may share information with regulators, auditors, or other vendors in their capacity as outlined in our agreements or as required by law. We may provide nonpublic information without your permission to third parties:
  - to respond to subpoena or court order, judicial process or regulatory authorities;
  - to consumer reporting agencies, in accordance with the Fair Credit Reporting Act;
  - to protect against fraud.
- Delta will not share your public or private information with any third party other than to conduct your business, as required by law, or as you instructed or requested us to do (such as your request to share information with your accountant, etc.).

### ***Our Former Customers***

Even if you are no longer a Delta customer, our Privacy Policy will continue to apply to you.

### ***Our Security Practices and Information Accuracy***

We also take steps to safeguard customer information. We restrict access to the personal and account information of our customers to those employees who need to know that information in the course of their job responsibilities. Our employees are bound by a code of ethics and legal and other requirements that require confidential treatment of customer information and are subject to disciplinary action if they fail to follow these requirements. We maintain physical, electronic, and

procedural safeguards to maintain the confidentiality of your information, and use reasonable security methods to protect the data that resides on our servers. We have taken reasonable measures to ensure that discarded documentation containing nonpublic information is properly destroyed and any discarded information contained in an electronic medium will be properly erased. These measures will safeguard against any information being read or reconstructed. If the confidentiality and security of your customer information is breached, we will notify you promptly, consistent with applicable law.

### ***Your Responsibility***

It is your responsibility to maintain the accuracy and completeness of your account information. Please contact us at [info@deltaim.com](mailto:info@deltaim.com) or by call us at 1-415-249-6337 to inquire about or update your account information.

### ***Questions?***

If you have questions about this policy or any other issue, please contact us:

Delta Investment Management, LLC  
708 Montgomery Street  
San Francisco, CA 94111  
415-249-6337