

# MIDWAY CAPITAL RESEARCH & MANAGEMENT LLC

150 N MICHIGAN AVENUE SUITE 800, CHICAGO, ILLINOIS 60601

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## **CLIENT PRIVACY STATEMENT**

### **Guiding Principles**

The relationship between Midway Capital Research and Management, LLC and our clients is the most important asset of our firm. We strive to maintain your trust and confidence in our firm, an essential aspect of which is our commitment to protect your personal information to the best of our ability. We believe that all of our clients value their privacy so we will not disclose your personal information to anyone unless it is required by law, at your direction, or necessary to provide you with our services. We have not and will not sell your personal information to anyone.

### **The Personal Information That We Collect, Maintain, and Communicate**

Midway Capital Research and Management, LLC collects and maintains your personal information so that we can provide investment management services to you. The types and categories of information we collect and maintain about you includes:

- Information we receive from you to open an account or provide investment advice to you (such as your name, social security number, home address, telephone number, and financial information);
- Information that we generate to service your account (such as trade tickets and account statements); and
- Information that we may receive from third parties with respect to your account (such as trade confirmations from brokerage firms).

In order for us to provide investment management services to you, we do disclose your personal information in very limited instances, which include disclosures to professional services firms such as auditors and brokers.

We may alter this policy or make disclosures to additional persons to the extent permitted by law if it is necessary in order to meet your service needs or conduct our business in a more efficient manner.

### **How We Protect Your Personal Information**

We restrict access to information about you to those Midway Capital Research and Management, LLC employees and agents who need it to perform their job duties. We maintain strict physical and procedural safeguards to protect your personal information. Finally, we treat information about former clients in the same manner we treat information about current clients.