



# Privacy Policy Notice

## **Saffron Capital LLC**

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## **Purpose**

Saffron Capital is a Registered Investment Advisor that provides its clients with systematic, model-based financial planning and investment management services. Our ability to serve clients requires us to collect and to use a client's nonpublic personal information (NPI). Safeguarding client trust, confidentiality, and data security is a high priority in our daily business and in our regulatory compliance efforts.

The purpose of this document is to provide our clients with full insight into the information Saffron Capital collects, how we safeguard your NPI, and what information we are required to share, if any.

## **Client Information**

NPI is either provided to us by you or obtained by us under your authorization. The NPI we are required by law to collect includes:

- Name
- Date of birth
- Proof of residence or business address
- Tax identification number
- At least two (2) government issued identification documents

The collection of specific NPI is required by Title 12 of the Code of Federal Regulations to open an investment account and helps to detect and prevent money laundering, tax evasion and other criminal activity. Additional personal information we collect during the normal course of business can include, but is not limited to, financial account data, employment and income information, current assets and liabilities, tax and accounting documents, insurance information, wills or estate documents, and closely held business information.

Information we do *not* collect and which we request that clients never share with us includes electronic passwords, pins or account access details for any banking, investment, insurance, retirement benefit, medical or trust accounts.

## **The Security of Your Information**

Saffron Capital uses leading technology, proven procedures, and common sense to protect your NPI and to ensure your easy access.

Primary controls we have instituted are listed below:

- *Limited Access* - Access to your client information is strictly limited to (1) 'access persons' which are defined to be the registered investment advisor responsible for your account; and (2) the Chief Compliance Officer (CCO) of Saffron Capital. Administrative staff do not have access to your NPI.
- *Background Checks* - Access persons have been subjected to fingerprinting and FBI background checks as a prerequisite for employment and regulatory registration.
- *Non-Disclosure* - All access persons are bound by non-disclosure agreements to reinforce and protect your interests.
- *Security Protocols* - All client NPI is converted to and stored in digital, encrypted and password-protected, compressed formats or archives.
- *Format* - The encryption format used is AES-256 established by the National Institute of Standards and Technology (NIST). AES-256 is used widely by the U.S. government. There is no known attack to allow someone without the encryption key to read AES-256 encrypted data when implemented correctly.

- *Cloud-based storage* – Primary storage solutions used by Saffron Capital are cloud-based and impose a second or redundant level of encryption around the client file archive we create and prior to internet transmission and storage.
- *Back-Up Storage* - Saffron Capital also relies on local storage of client files. A remote storage device outside of the company’s office stores all essential business and client files in encrypted format with an “air gap,” implying no device connection to the internet or any other network.
- *Security* – Saffron Offices are protected by 24/7 security including camera surveillance and barrier controls. If an office barrier is breached, passwords and encryption keys are stored on separate devices from the client archives. Password access is also protected by multi-factor authentication.
- *Security Testing* - At the end of each quarter, a cyber security risk assessment is completed to ensure encryption and password protection has been implemented correctly and that all client information is securely stored and backed-up.
- *Data Recovery Services*: All devices owned by Saffron Capital for back-up storage have bundled services for data recovery in case a device is damaged.
- *Vendor Due Diligence* - All vendors we rely on for cloud storage are vetted to ensure they have well-configured privacy policies, data center security, and business continuity plans. Due diligence also ensures that vendor employees cannot access client encrypted and password protected file archives.
- *Business Continuity Plans (BCP)* – The Saffron Capital BCP provides immediate access to all essential business and client files on demand.

### **The Availability of Your Information**

Client always have access to their data and information files in our care. We make client archives available on demand at our main office (listed on the cover page) given advance notice in writing by an authorized account owner(s). We also to provide data on client request to any CPA, lawyer or agent that is introduced to us by the client and given a limited power of attorney signed by the client.

### **Your Account and Fund Security**

Saffron Capital does not have access to your account funds at any time. Saffron Capital relies on bank custodians to secure your funds, to transfer and warehouse any securities or funds you own, and to independently report on your account performance. Sharing NPI with Saffron Capital does not compromise your account security.

### **Information We Disclose**

Saffron Capital has limited need to share your NPI. We only disclose client information as defined below:

- For custodial banking and account administration: We work in collaboration with you to setup and maintain investment account(s). In these cases, we share NPI with the bank custodian given your consent to process client investment orders, to reconcile client portfolio records, and for periodic account billing and reporting.
- For other client directed transactions: Following your written instruction, we will also disclose and provide NPI to support you with other financial transactions as needed.
- For managing and auditing compliance: Clients acknowledge that Saffron Capital may be required to provide client NPI to independent auditors or regulator that seek to test and assess the business integrity and compliance of Saffron Capital. These disclosures are limited and exist to protect investors and the public interest.

- For requests provided by law: Saffron Capital is required to share client NPI given any properly executed governmental request.

At present, Saffron Capital does not rely on any third parties for the direct handling of client NPI other than your independent bank custodian. If the operations of Saffron Capital require third-party support, then clients will be notified in advance and given an opportunity to opt-out of any third-party data access. Such vendors, if engaged, will be properly vetted, and will adhere to the same privacy rules and compliance protections as Saffron Capital.

### **Record Retention and Sharing**

Registered Investment Advisors are required to retain client information for long-term recordkeeping and retention. When you are no longer our customer, we are required to archive your encrypted and secure data for up to 6 years. We may also be required to share your information in limited circumstances for audit and compliance purposes, as described above.

### **Client Consent to Receive Important Documents via Electronic Delivery**

By signing the client acknowledgment below, you consent to receive important documents via electronic delivery.

### **Clients Can Limit Sharing**

You can contact us at any time to modify or stop our limited information sharing and we will be glad to amend our client contracts as needed. Federal law allows you the right to limit the sharing of your non-public information. State laws may also give you additional rights not listed here to limit information sharing. Please notify Saffron Capital immediately if you have specific privacy instructions for us.

### **Client Acknowledgments**

Please initial all that apply:

I acknowledge receipt of the Privacy Policy Notice

I do not want to share my nonpublic personal information with any non-affiliated companies or service providers retained by Saffron Capital (other than those I approve in advance or those required by law or for compliance purposes).

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_