

RCM

RIDGE CAPITAL MANAGEMENT, LLC

Privacy Policy **May 2022**

Ridge Capital Management, LLC, (“RCM”) an independently owned Registered Investment Advisory Firm, considers client privacy to be a fundamental aspect of our client relationships. We are committed to maintaining the confidentiality, integrity, and security of our current, prospective and former clients’ personal information.

In the course of providing you with advisory services, we collect, retain, and use client information for the purpose of administering our operations, providing client service, and complying with legal and regulatory requirements. This information may come from sources such as account applications, investment policy statements, from your transactions, and other forms from other written, electronic or verbal correspondence from your brokerage, attorney, accountant or other advisor you may employ. We do not sell, exchange or disclose client information with outside organizations unless the third party is essential in administering our operations or except as required or permitted by law, to comply with a court order, subpoena or similar legal process; in connection with an audit or regulatory examination or investigation, or when such disclosures will help support our detection of, prevention of, or response to fraud; help protect your safety or security; or protect the safety and security of our services

We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. No confidential information, whatever the source, regarding any customer or client, may be disclosed except the following: We reserve the right to disclose or report personal information where we believe in good faith that disclosure is required under law, to cooperate with regulators or law enforcement authorities. RCM reserves the right to disclose information with other

Securities offered through First Allied Securities, Inc., (“First Allied”) A Registered Broker/Dealer, Member: FINRA/SIPC. Advisory services offered through Ridge Capital Management, LLC (“RCM”) and, Cetera Investment Advisers, LLC (“CIA”) both Registered Investment Advisors. RCM is not affiliated with First Allied or CIA. Investment advisory and brokerage services involve different types of fees, compensation arrangements rights and responsibilities. Please refer to our Form ADV Part 2A Brochure available by contacting us or at www.adviserinfo.sec.gov.

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RCM employees in connection with our business and to non-affiliated third parties with whom a contractual agreement to jointly offer, endorse or sponsor a financial product or service; and to service and maintain customer accounts including effectuating a transaction. We may also share information with companies that perform services on our behalf, such as the companies that we hire to perform marketing or administrative services and with our attorneys, accountants, consultants, or auditors; and other professionals that assist us in providing services to you. RCM may also disclose information about client or client's account to a non-affiliated third party at client's written request. If you decide to terminate the advisory relationship with us and close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

We maintain physical, electronic, and procedural security measures to safeguard confidential client information. To further safeguard client information digitally, we maintain password protected systems, updated anti-virus and anti-spyware software, and encrypted hardware and software firewalls.

If we make any substantial changes in the way we use or disseminate confidential information, we will provide you with an updated Privacy Notice. Please contact us at 770-516-7747 if you have any questions concerning our Privacy Policy.

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