



WHY?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

WHAT?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and financial account numbers
- Account balances and transaction information
- Income and employment information

HOW?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons CINCaP Asset Management, LLC [CINCaP] chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does CINCaP share?	Can you limit this sharing?
<b>For our everyday business purposes-</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus (To other companies as necessary to process your business, such as RBC Clearing and Custody, a division of RBC Capital Markets, LLC, Member NYSE/FINRA/SIPC our clearing firm for trade executions and reporting of assets)	YES	NO
<b>For our marketing purposes-</b> to offer our products and services to you	YES	NO
<b>For joint marketing with other financial companies</b>	NO	We do not share
<b>For non-affiliates to market to you</b>	NO	We do not share
<b>CINCaP has an affiliate</b>	We have an affiliate	We do not share

Questions?

Call 513-725-4841

**Who is providing this notice?**

CINCaP Asset Management, LLC [CINCaP]

**How does CINCaP protect my personal information?**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

**How does CINCaP collect my personal information?**

We collect your personal information, for example, when you

- Open an account or make deposits or withdrawals from your account
- Direct us to buy securities or direct us to sell your securities
- Tell us about your investment or retirement portfolio

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

**Why can't I limit all sharing?**

Federal law gives you the right to limit only

- Sharing for affiliates' everyday business purposes-information about your creditworthiness
- Affiliates from using your information to market to you
- Sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

**What happens when I limit sharing for an account I hold jointly with someone else?**

Your choices will apply to everyone on your account.

**Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- CINCaP has an affiliation with CINCaP Investment Group, Inc.

**Non-affiliates**

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- CINCaP does not share with non-affiliates so they can market to you.

**Joint Marketing**

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- CINCaP does not joint market.