

## **Privacy Policy**

Your privacy is important to Chalk Creek Partners LLC (“Chalk Creek,” “we,” “our”). It is also important that you understand what information we collect about you and what we do with that information. First and foremost, whenever client information (or potential client) is used, it is done so with discretion. We value your trust in us, and we owe it to you to protect your information.

As a registered investment adviser, Chalk Creek Partners, LLC and all supervised persons, must comply with SEC Regulation S-P, which requires investment advisers to adopt policies and procedures to protect the 'nonpublic personal information' of natural person clients. 'Nonpublic information,' under Regulation S-P, includes personally identifiable financial information and any list, description, or grouping that is derived from personally identifiable financial information. Personally identifiable financial information is defined to include information supplied by individual clients, information resulting from transactions, or any information obtained in providing products or services. Pursuant to Regulation S-P, Chalk Creek has adopted policies and procedures to safeguard the information of natural person clients.

Furthermore and pursuant to the SEC's adoption of Regulation S-ID: Identity Theft Red Flag Rules, all 'financial institutions' and 'creditors' (as those terms are defined under the Fair Credit Reporting Act (FCRA)) must develop and implement a written identity theft prevention program designed to detect, prevent, and mitigate identity theft in connection with certain existing accounts or the opening of new accounts ("covered accounts"). Chalk Creek Partners, LLC has conducted an initial assessment of its obligations under Regulation S-ID and to the extent such rules are applicable, has incorporated appropriate policies and procedures in compliance with the Red Flags regulations.

### **We share information with certain nonaffiliated third parties**

We share information with unaffiliated third parties when those parties are acting on our behalf or when required by law. These parties include service providers that help us deliver our services. These companies are legally obligated to maintain client confidentiality. They are legally restricted from using this information for any reason beyond the outlined services dictated by our contracts with them. Other parties with whom we share information are government agencies or others as required by law. The only companies with which we currently share information are TD Ameritrade, Inc, Charles Schwab & Co., and Capitect, Inc. (outsourced fee calculation and performance reporting). This information includes personally identifiable information as well as account specific information like account balances and transactions.

We will maintain the personal information of our former clients and investors following the same policies that apply to our current clients and investors.

Federal law gives you the right to limit the sharing of your personal information for marketing with other financial companies, for affiliates everyday business purposes (information about your credit worthiness), for our affiliates and nonaffiliates to market to you. Chalk Creek and its affiliates do not share this information for these purposes.

### **Enforcement and Review of Confidentiality and Privacy Policies**

Carlisle Wysong is responsible for reviewing, maintaining and enforcing Chalk Creek Partners, LLC's confidentiality and privacy policies and is also responsible for conducting appropriate employee training to ensure adherence to these policies. Any exception to this policy requires the written approval of Carlisle Wysong.

### **Changes to this Privacy Policy**

Chalk Creek reserves the right, in our sole discretion, to change, modify, add, or remove portions of the Privacy Policy at any time without providing any notice. Accordingly, we suggest that you review this Policy periodically for changes.

Please contact us with any questions:

[ccw@chalkcreekpartners.com](mailto:ccw@chalkcreekpartners.com)

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