

## FACTS

### What Does Focused Alpha, LLC Do With Your Personal Information?

## The Law

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.

## Our Policy

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

- Income
- Employment and residential information
- Social security number
- Cash balance
- Security balances
- Transaction detail history
- Investment objectives, goals, and risk tolerance

When you are *no longer* a client, we continue to share your information as described in this notice.

## Your Rights

All financial companies need to share customers' personal information to run their everyday business. We list below the reasons financial companies can share their customers' personal information; the reasons Focused Alpha chooses to share; and whether you can limit this sharing.

### Definitions

|                            |                                                                                                                                                                                                                                                              |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Everyday Business Purposes | The actions necessary by financial companies to run their business and manage customer accounts, such as providing investment advisory and financial planning advice, processing securities transactions, and otherwise providing financial services to you. |
| Affiliates                 | Companies related by common ownership or control. They can be financial and nonfinancial companies. Focused Alpha has no affiliate entities.                                                                                                                 |
| Non-Affiliates             | Companies not related by common ownership or control. They can be financial and nonfinancial companies. Focused Alpha does not share information with non-affiliates for marketing purposes.                                                                 |
| Joint Marketing            | A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Focused Alpha does not engage in joint marketing with non-affiliates.                                                               |

| Reasons we can share your personal information                                                                        | Does Focused Alpha share?          | Can you limit this sharing? |
|-----------------------------------------------------------------------------------------------------------------------|------------------------------------|-----------------------------|
| For our everyday business purposes—such as to provide advice, process your transactions, and maintain your account(s) | Yes                                | No                          |
| For our marketing purposes—to offer our products and services to you                                                  | Yes                                | No                          |
| For joint marketing with other financial companies                                                                    | No                                 | We do not share             |
| For our affiliates' everyday business purposes—information about your transactions and experiences                    | No                                 | We do not share             |
| For our affiliates' everyday business purposes—information about your creditworthiness                                | No                                 | We do not share             |
| For our affiliates to market to you                                                                                   | No                                 | We do not share             |
| For non-affiliates to market to you                                                                                   | No                                 | We do not share             |
| <b>Contact Us</b>                                                                                                     | Call Focused Alpha at 303-529-5100 |                             |

| Sharing Practices                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2                                                       | We must notify you about our sharing practices when you become a client or if we change our information sharing policies and procedures.                                                                                                                                                                                                                                                                                                                                           |
| How does Focused Alpha 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. Any mobile phone number and text messaging consent provided to us will be used only for communications relating to our services. Mobile phone numbers and consent information will not be shared with third parties or affiliates for marketing or promotional purposes. |
| How does Focused Alpha collect my personal information? | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>• establish an investment advisory relationship</li> <li>• contract for financial planning services</li> <li>• open an account or deposit money with custodians</li> <li>• purchase or sell securities with executing broker-dealers</li> </ul> <p>We also collect your personal information from others, such as custodians, broker-dealers, or other companies.</p>    |
| Why can't I limit all sharing?                          | <p>Federal law gives you the right to limit sharing only for</p> <ul style="list-style-type: none"> <li>• affiliates' everyday business purposes—information about your creditworthiness</li> <li>• affiliates to market to you</li> <li>• non-affiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>                                                                                                  |

If you would like a copy of the Focused Alpha, LLC Form ADV Part 2A and 2B, please send a written request to:

Focused Alpha, LLC  
5680 Greenwood Plaza Blvd., #120  
Greenwood Village, CO 80111

If you wish to modify or impose reasonable restrictions concerning the management of your account, or if your financial situation, investment objectives, or risk tolerance have changed, please contact Daniel Barotz at 303-529-5100. We will contact you at least annually to determine if your investment goals, objectives, and risk tolerance have changed.

We urge that you advise us immediately if you have not received your custodian or brokerage statement, which is required to be delivered to you no less frequently than quarterly. In addition, please compare any account information provided by us with account statements from your broker-dealer or custodian and to advise us of any discrepancies. The official record of your account is maintained by your broker-dealer or custodian. Thank you.