

Privacy Policy

Kolo Capital, like other professional service firms that advise personal financial matters, is required by federal law to inform its clients of its policies regarding the privacy of client information. Kolo Capital is committed to maintaining the confidentiality and security of our client's personal and private information. Please take a moment to review our privacy policies and procedures that we have implemented to safeguard your nonpublic information personal information.

Information We Collect

In the course of providing clients with advice, Kolo Capital may receive certain non-public information, personally identifiable financial and private information from its clients, their accountants, their attorneys and other third party representatives, such as financial statements, tax returns, legal documents and other personal information. Kolo Capital may also gather information about clients during the normal course of its business from various forms or other applications, or from transactions clients conduct with Kolo Capital and/or its affiliates, or that Kolo Capital may place on clients' behalf. Kolo Capital collects and uses this information in order to ensure that it offers the highest quality financial services and provides access to the highest quality financial products to its clients.

Information We Disclose

All non-public information that we receive regarding our clients or former clients is held in the strictest confidence in accordance with our professional obligations and is not released to people outside Kolo Capital except with the clients consent, as otherwise set forth herein or as required by law. We may disclose some or all of the information we collect, as described above, to certain non-affiliated third parties such as attorneys, accountants, auditors and persons or entities who assist us in our business or who are assessing our compliance with industry standards and SEC regulations. We may also disclose information to regulators or other government entities as permitted or required by law.

Your non-public information is used only for our business purposes and we do not sell client information to anyone. At your direction we may share certain information with related or affiliated entities or third parties who assist us with providing our services, including outsourced service providers located outside of the United States. These include but not limited to specified family members and a client's related and affiliated entities and other firms such as accountants, lawyers, financial institutions and bill pay electronic storage service providers, subject to the obligation of all such third parties not to use or disclose such information for any other purpose.

Confidentiality & Security

Within Kolo Capital, access to a client's non-public information is restricted to individuals who require that information in the ordinary course of servicing a client's account. Where a client's non-public information is shared or reviewed by a non-affiliated third party, Kolo Capital will review that non-affiliated third party's privacy policies to insure such policies prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we may disclose the information.

In order to guard your non-public information from unauthorized disclosure, we maintain the physical, electronic and procedural safeguards that comply with our professional standards as well as the law to guard your non-public personal information at all times. With respect to online privacy, we employ certain internet specific practices to maintain the security of your online sessions, including but not limited to firewall barriers, encryption and authentication procedures.

In the event that these policies change, Kolo Capital will provide you with sufficient amount of time to opt out of any disclosure provisions. Nevertheless, Kolo Capital will provide a copy of its annual privacy notice to all clients upon inception of our investment advisory services.