



## **Privacy Policy**

Issue Date: January 2018

As a registered and regulated investment adviser, the Equitable Strategy Group Global Ltd. (ESG) must comply with all BVI FSC Rules and Regulations, which requires registered advisers to adopt policies and procedures to protect the "nonpublic personal information" of natural person consumers and customers and to disclose to such persons policies and procedures for protecting that information.

Nonpublic personal information includes nonpublic "personally identifiable financial information" plus any list, description or grouping of customers that is derived from nonpublic personally identifiable financial information. Such information may include personal financial and account information, information relating to services performed for or transactions entered into on behalf of clients, advice provided by ESG to clients, and data or analyses derived from such nonpublic personal information.

It is also part of ESG's Fiduciary duty to its clients to use particular care where confidential information is concerned. The use of non-public client information for personal gain by an ESG employee, employee relative or friend; will not be tolerated and is not in the best interest of the client. This violates the fiduciary duty, confidentiality agreement and insider trading policy. All ESG employees must act for the benefit of the client and place the clients' interest before their own.

Confidential information may only be disclosed to a third party if the third party is a) a federal or state regulated agency entitled to such information and the information is requested by them, b) custodian to a clients account or c) permission has been granted by the client for the information to be released (i.e. to a Client's accountants or legal representatives).

Maintaining the confidentiality of client personal financial information is very important to us. To provide clients with superior service, we may collect several types of nonpublic personal information about clients, including:

Information from forms that clients may fill out and send to us in connection with an investment advisory relationship with us (such as name, address, and social security number).

Information a client may give us orally.

Information about the amount clients have given us to invest on their behalf.

Information about any bank account clients may use for transfers between a bank account and their brokerage account.



# The Equitable Strategy Group Global Ltd.

We do not sell or disclose client personal information to anyone except as required by law. For example, we may share information collected about our clients with our legal counsel as we deem appropriate and with regulators. Additionally, we may disclose information about clients at the client's request (for example, by sending duplicate account statements to someone designated by the client), or as otherwise permitted and/or required by law.

Within ESG, access to information about clients is restricted to those employees who need to know the information to service client accounts. Our employees are trained to follow our procedures to protect client privacy and are instructed to access information about clients only when they have a business reason to obtain it.

We reserve the right to change our privacy policy in the future, but we will not disclose client nonpublic personal information as required or permitted by law without giving the client an opportunity to instruct us not to.

## Background

The purpose of these privacy policies and procedures is to provide administrative, technical and physical safeguards that assist employees in maintaining the confidentiality of nonpublic personal information collected from the consumers and customers of an investment adviser. All nonpublic information, whether relating to an adviser's current or former clients, is subject to these privacy policies and procedures. Any doubts about the confidentiality of client information must be resolved in favor of confidentiality.

## Responsibility

ESG's Directors are responsible for reviewing, maintaining and enforcing these policies and procedures to ensure meeting ESG's client privacy goals and objectives while at a minimum ensuring compliance with applicable BVI and other jurisdictional laws and regulations. ESG's Directors are also responsible for distributing these policies and procedures to employees and conducting appropriate employee training to ensure employee adherence to these policies and procedures.



## Procedure

ESG has adopted various procedures to implement the firm's policy and reviews to monitor and insure the firm's policy is observed, implemented properly and amended or updated, as appropriate, which include the following:

1. **Non-Disclosure of Client Information:** ESG maintains safeguards to comply with federal and state standards to guard each client's nonpublic personal information. ESG does not share any nonpublic personal information with any nonaffiliated third parties, except in the following circumstances:
  - (i) As necessary to provide the service that the client has requested or authorized, or to maintain and service the client's account;
  - (ii) As required by regulatory authorities or law enforcement officials who have jurisdiction over ESG, or as otherwise required by any applicable law; and
  - (iii) To the extent reasonably necessary to prevent fraud and unauthorized transactions.
2. Employees are prohibited, either during or after termination of their employment, from disclosing nonpublic personal information to any person or entity outside ESG, including family members, except under the circumstances described above. An employee is permitted to disclose nonpublic personal information only to such other employees who need to have access to such information to deliver our services to the client.
3. **Security and Disposal of Client Information:** ESG restricts access to nonpublic personal information to those employees who need to know such information to provide services to our clients. Any employee who is authorized to have access to nonpublic personal information is required to keep such information in a secure compartment or receptacle on a daily basis as of the close of business each day. All electronic or computer files containing such information shall be password secured and firewall protected from access by unauthorized persons. Any conversations involving nonpublic personal information, if appropriate at all, must be conducted by employees in private, and care must be taken to avoid any unauthorized persons overhearing or intercepting such conversations.
4. Any employee who is authorized to possess "consumer report information" for a business purpose is required to take reasonable measures to protect against unauthorized access to or use of the information in connection with its disposal.



## Privacy Notices

ESG will provide each natural person client with initial notice of the firm's current policy when the client relationship is established. ESG shall also provide each such client with a new notice of the firm's current privacy policies at least annually.

If, at any time, ESG adopts material changes to its privacy policies, the firm shall provide each such client with a revised notice reflecting the new privacy policies. The Directors are responsible for ensuring that required notices are distributed to the ESG's consumers and customers.