



COVENANT CAPITAL ADVISORS, LLC

PRIVACY POLICY

Covenant Capital Advisors (CCA) is required to maintain compliance with privacy rules that are applicable to Registered Investment Advisors. Protecting nonpublic personal information is an issue that CCA's personnel views seriously. CCA has adopted internal written policies and procedures designed to help safeguard client and consumer records and information.

In its role as Investment Advisor, CCA routinely collects nonpublic personal information from clients and prospective clients ("consumers"). This information generally will include but is not limited to:

- Information provided from applications, forms and other information provided to us either verbally or in writing, and include but are not limited to your name, address, phone number, account information, social security number, assets, employment, income and debt;
- Information about your transactions, accounts, trading activity and parties to transactions; health and beneficiary information (such as may pertain to financial planning issues);
- Information provided by outside sources;
- Any other data that is deemed to be nonpublic personal information as defined by state privacy rules.

CCA values clients' and consumers' trust and confidence. CCA will never sell nonpublic personal information we obtain from clients or consumers. All information provided by clients or prospective clients to CCA, (including the Advisor's personnel), and information and advice furnished by the Advisor to clients, shall be treated as confidential and shall not be disclosed to unaffiliated third parties, except: as may be directed by CCA's clients with written authorization, by application to facilitate the investment advisory services offered by the Advisor via an unaffiliated financial services provider (such as the client's selected custodial and brokerage firm), or as required by any rule, regulation or law to which the Advisor and its personnel are subject.

CCA maintains client and consumer data and records in a controlled environment and this data (electronic and otherwise) is only available to authorized persons of the Advisor who have a need to access the information in order to deliver advisory services, provide administrative support, or to respond to client or consumer requests. The Advisor only communicates protected data via a secure format and takes reasonable precautions to help ensure its electronic work environment is secure.

CCA's position on protecting non-public personal information extends beyond the life of the client agreement. Client information is retained in a protected manner for the time period required by regulators (to the fifth fiscal year end following the date of last use) and is thereafter safely destroyed electronically or via in-house shredding.

Consumers (those persons who are not clients) who provide information during an initial consultation or for other purposes but do not go on to become CCA clients also receive privacy protection. Original information will be promptly returned in person or via the mail if the Advisor's services are not engaged. Alternatively, if nonpublic personal information is contained in copies of documents, notes or some other media, this information will be securely filed for a period of up to one year (depending upon likelihood of engagement) before being destroyed electronically or shredded in-house.

Clients and prospective clients are encouraged to discuss any questions regarding CCA's privacy policies and procedures with James Duronio, Managing Member and Chief Compliance Officer.