

FULLER INVESTMENT MANAGEMENT COMPANY®

PRIVACY POLICY

This Privacy Policy describes Fuller Investment Management Company's (Fuller Investment) privacy policies with respect to current and prospective clients/investors. We appreciate your decision to invest with us, and we want you to know that your privacy is of utmost importance to us.

We are sending you this notice pursuant to the Securities and Exchange Commission rules requiring financial institutions such as investment advisers and private funds ("Financial Institutions") to provide their clients/investors with a privacy notice describing the Financial Institution's policies regarding the sharing of information. We do not disclose nonpublic, personal information about our investors to third parties other than as permitted by law, other than as described below.

Through the course of providing services to our clients, we receive and collect personal information (such as name, date of birth, social security number, and relevant client account information) provided through conversations with you, applications, contracts, or other client documents, and client account transactions. We may use this information to accept you as a client/investor, to process a transaction for you, or otherwise in furtherance of our business conducted on your behalf. In order to service your account and process your transactions, we may provide your personal information to our affiliates and firms we engage to assist us in servicing your account and that have a need for such information, such as an outside accounting firm, auditor, attorney, custodian, or fund administrator. We may also disclose such information to financial institutions with which we have joint client/investor relationships. We require third party service providers and financial institutions with which we have joint client/investor relationships to protect the confidentiality of your information and use the information only for the purposes for which we disclose the information to them. Except as noted above, or as required by law, we do not otherwise provide information about you to any other third parties without your prior permission.

We maintain physical, electronic, and procedural safeguards to guard your personal information.

If you have any questions or comments regarding our Privacy Policy, please contact our Chief Compliance Officer, Brian Rietze, at (626) 765-8450.

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