

PRIVACY NOTICE

We care deeply that your personal information is kept private and confidential. As you know, we require certain personal financial information in order to manage your account in a manner consistent with your investment objectives and personal financial goals. We gather information from you directly, through personal discussions and our Client Investment Questionnaire, and indirectly, when you share information with us from other financial service providers that serve you. This privacy notice applies to confidential information provided to Manchester Capital Management (“Manchester Capital Management” or “MCM”) and the affiliated family of investment funds for which Manchester Capital Management serves as general partner.

FACTS

WHAT DOES MANCHESTER CAPITAL MANAGEMENT DO WITH YOUR PERSONAL INFORMATION?

WHY?

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 and what we don’t do.

WHAT?

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

- Social security number and address(es)
- Phone numbers and financial information

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

HOW?

All financial companies need to share personal information to run their everyday business. In the section below, we list the reasons financial companies can share their personal information, the reasons Manchester Capital Management and its affiliates choose to share, and whether you can limit this sharing.

REASONS WE CAN SHARE YOUR PERSONAL INFORMATION	DOES MCM SHARE?	CAN YOU LIMIT THIS SHARING?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations	Yes	No
For our marketing purposes— to offer our products and services to you	No	n/a
For joint marketing with other financial companies	No	n/a
For our affiliates’ everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes— information about your creditworthiness	No	n/a
For nonaffiliates to market to you	No	n/a

WHO WE ARE

Who is providing this notice?	Manchester Capital Management and its affiliated family of investment funds.
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WHAT WE DO

How does Manchester Capital Management and its affiliates 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. Manchester Capital Management maintains physical, electronic, and procedural safeguards to guard your non-public personal information, including the personal information provided to the investment funds for which it serves as general partner.
How does Manchester Capital Management and its affiliates collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none">• open an account or information generated to service your account <i>or</i>• information we receive from you to provide investment advice Information that we receive from third parties with respect to your account (such as trade confirmations from brokerage firms).
Why can't I limit all sharing?	Federal law gives you the right to limit only: <ul style="list-style-type: none">• sharing for affiliates' everyday business purposes – information about your creditworthiness• affiliates from using your information to market to you• sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.

DEFINITIONS

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. The investment funds for which Manchester Capital Management, LLC serves as general partner are our "affiliates."
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.

QUESTIONS?

Call 802-362-4410 or go to <http://www.mcmlc.com>