



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, LLC (“Manchester Capital Management” or “MCM”) and the affiliated family of investment funds for which MCM 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.	
WHAT?	The types of personal information we collect and share depend on the product 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 accounts(s) or 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 our affiliates to market to you	No	n/a
For non-affiliates to market to you	No	n/a
Who we are		
Who is providing this notice?	Manchester Capital Management and its Affiliates	

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: • open an account or information generated to service your account • provide information to MCM when seeking 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 • sharing for affiliates' everyday business purposes—information about your creditworthiness • affiliates from using your information to market to you • sharing for non-affiliates 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.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. • MCM does NOT share with non-affiliates.

*NOTICE TO CALIFORNIA AND VERMONT RESIDENTS

California Financial Information Privacy Act "SB-1" is intended to further restrict the sharing of nonpublic personal information beyond the provisions of the federal Gramm-Leach-Bliley Act and its amendments including the Fixing America's Surface Transportation Act. Under SB-1, a financial institution must receive an "opt-in" from a customer before sharing non-public information with Nonaffiliates. As set forth above, MCM does not share non-public information. Sufficient disclosure as to sharing non-public information between Affiliates must be provided as well as reasonable time given to the customer to "opt-out".

Vermont law requires certain financial institutions to obtain a consumer's consent before sharing nonpublic personal financial information with certain nonaffiliated third parties, except as otherwise permitted by law. Manchester Capital Management, LLC does not share nonpublic personal financial information except as permitted by applicable law and as described in this Privacy Notice.

Questions?	Call 802-362-4410 or go to http://www.mcmlc.com
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