



Each subsidiary of ORIX Corporation USA (“**ORIX USA**”) that is registered as an investment adviser with the SEC (each an “**RIA**” and, collectively, the “**RIAs**”) process personal information. Respecting and protecting customer privacy has always been important to our business. This Privacy Notice describes how each RIA gathers and uses personal information about you. It is important to note that privacy practices may vary among the jurisdictions in which we operate to reflect local practices and legal requirements.

## FACTS

### WHAT DOES THE RIA DO WITH YOUR PERSONAL INFORMATION?

<b>Why?</b>	Financial companies choose how they share your personal information. Federal, state and foreign law gives consumers the right to limit some but not all sharing. The RIA is required to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand our practices and if you have any questions or concerns, please contact us at <a href="mailto:dataprivacy@lument.com">dataprivacy@lument.com</a> .
<b>What?</b>	The types of personal information we collect and share depend on the product or service we provide to you. This information can include: <ul style="list-style-type: none"> <li>■ Social Security number and assets;</li> <li>■ Account balances and transaction history; and</li> <li>■ Investment experience and wire transfer instructions.</li> </ul>
<b>How?</b>	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons the RIA chooses to share; and whether you can limit this sharing.

#### Reasons we can share your personal information

#### Does RIA 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, or report to credit bureaus

Yes

No

**For our marketing purposes** – to offer our products and services to you

Yes

No

**For joint marketing with other financial companies**

No

No

**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

We don't share

**For our affiliates to market to you**

Yes

Yes

**For non-affiliates to market to you**

No

We don't share

#### To limit our sharing:

- Call (646) 569-2300 or [dataprivacy@lument.com](mailto:dataprivacy@lument.com).

#### Please note:

If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

#### Questions?

Call (646) 569-2300 or [dataprivacy@lument.com](mailto:dataprivacy@lument.com).

**Who we are****Who is providing this notice?**

Lument Investment Management, LLC

**What we do****How does the RIA protect my personal information?**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law (and in certain cases state law). These measures include computer safeguards and secured files and buildings.

**How does the RIA collect my personal information?**

We collect your personal information, for example, when you:

- give us your contact information;
- enter into an investment advisory contract or buy securities from us or an affiliate (e.g., invest in an RIA advised fund or other investment vehicle); and
- tell us where to send the money or make a wire transfer.

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

**Why can't I limit all sharing?**

USA 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; and
- sharing for non-affiliates to market to you.

EU and USA State laws and individual companies may give you additional rights to limit sharing.

**What happens when I limit sharing for an account I hold jointly with someone else?**

Your choices will apply to everyone on your account.

**Definitions****Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include ORIX Advisers, LLC, NXT Capital, LLC, Boston Financial Investment Management, LP, Lument Securities, LLC*

**Non-affiliates**

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *The RIA does not share with non-affiliates so they can market to you.*

**Joint marketing**

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *The RIA does not engage in joint marketing.*