

# ATTACHMENT B:

## PRIVACY NOTICE

As an entity registered with the Securities and Exchange Commission (SEC), BIAS is obliged to disclose certain information to all clients and prospective clients. This notice is being provided to you in accordance with the SEC's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your non-public personal information<sup>1</sup>.

<b>WHY?</b>	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.	
<b>WHAT?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"><li>■ Social security number or similar number</li><li>■ Income</li><li>■ Assets</li><li>■ Risk tolerance</li><li>■ Transaction history</li><li>■ Employment details</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 BIAS chooses to share; and whether you can limit this sharing.	
<b>Reasons we can share your personal information:</b>	<b>Does BIAS Share?</b>	<b>Can you limit this sharing?</b>
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your account(s) or respond to court orders and legal investigations.	Yes	No
<b>For our affiliates' everyday business purposes</b> - information about your transactions and experiences, excluding creditworthiness.	Yes	No

<sup>1</sup> Non-public personal information means personally identifiable financial information and any list, description or other grouping of consumers that is derived using any personally identifiable financial information that is not publicly available.

<b>For our affiliates' everyday business purposes –</b> information about your creditworthiness	Yes	No
<b>Questions?</b>	Please contact Robert Pires at <b>441-292-4292</b> or visit our website: <b>www.bias.bm</b>	
<b>Who we are</b>		
<b>Who is providing this notice?</b>	Bermuda Investment Advisory Services Limited (“BIAS”)	
<b>What we do</b>		
<b>How does BIAS Limited protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with applicable law. These measures include computer safeguards and secured files and buildings.	
<b>How does BIAS collect my personal information?</b>	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>■ Enter into an investment advisory contract</li> <li>■ Seek financial advice</li> <li>■ Make deposits or withdrawals from your account</li> <li>■ Tell us about your investment or retirement portfolio</li> <li>■ Give us your employment history</li> </ul>	
<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.	
<b>Definitions</b>		
<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>■ <i>BIAS is affiliated with BIAS Asset Management, Ltd., and BIAS (Cayman) Limited.</i></li> </ul>	

<p><b>Nonaffiliates</b></p>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ Nonaffiliates we can share with include BrokerDealers, Investment Managers, Custodians and Fund Administrators.</li> </ul>
<p><b>Job Marketing</b></p>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ BIAS does not jointly market.</li> </ul>

**Other important information**

**INFORMATION WE COLLECT**

Bermuda Investment Advisory Services Limited (BIAS) must collect certain personally identifiable financial information about its customers to provide financial services and products. The personally identifiable financial information that we gather during the normal course of doing business with you may include:

1. information we receive from you on applications or other forms;
2. information about your transactions with us, our affiliates, or others;
3. information collected through an Internet “cookie” (an information collecting device from a web server).

**INFORMATION WE DISCLOSE**

We do not disclose any non-public personal information about our customers or former customers to anyone, except as permitted or required by law, or as necessary to provide services to you. In accordance with Sections 248.13 through 248.15 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain non-affiliated third parties such as, but not limited to, attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

**CONFIDENTIALITY AND SECURITY**

We restrict access to non-public personal information about you to those employees who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.



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